Woodcase Fine Cabinetry, Inc.
3255 W. Osborn Road
Permit Number V97-014
Including Significant Revision S05-007
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October 3, 2005

Woodcase Fine Cabinetry, Inc.
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Permit Number V97-014
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In accordance with Maricopa County Air Pollution Control Rules and Regulations (Rules), Rule 210 § 302.2, all Conditions of this Permit are federally enforceable unless they are identified as being locally enforceable only. However, any Permit Condition identified as locally enforceable only will become federally enforceable if, during the term of this Permit, the underlying requirement becomes a requirement of the Clean Air Act (CAA) or any of the CAA's applicable requirements.

All federally enforceable terms and conditions of this Permit are enforceable by the Administrator of the United States Environmental Protection Agency (Administrator or Administrator of the USEPA hereafter) and citizens under Section 304 of the CAA.

Any cited regulatory paragraphs or section numbers refer to the version of the regulation that was in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise.

GENERAL CONDITIONS:

1. **AIR POLLUTION PROHIBITED:** [County Rule 100 §301] [SIP Rule 3]
The Permittee shall not discharge from any source whatever into the atmosphere regulated air pollutants which exceed in quantity or concentration that specified and allowed in the County or State Implementation Plan (SIP) Rules, the Arizona Administrative Code (AAC) or the Arizona Revised Statutes (ARS), or which cause damage to property or unreasonably interfere with the comfortable enjoyment of life or property of a substantial part of a community, or obscure visibility, or which in any way degrade the quality of the ambient air below the standards established by the Maricopa County Board of Supervisors or the Director of the Arizona Department of Environmental Quality (ADEQ).

2. **CIRCUMVENTION:** [County Rule 100 §104] [40 CFR 60.12] [40 CFR 63.4(b)]
The Permittee shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of regulated air pollutants to the atmosphere, conceals or dilutes an emission which would otherwise constitute a violation of this Permit or any Rule or any emission limitation or standard. The Permittee shall not circumvent the requirements concerning dilution of regulated air pollutants by using more emission openings than is considered normal practice by the industry or activity in question.

3. **CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS:**
[County Rule 100 §401] [County Rule 210 §§301.7, 302.1e(1), 305.1c(1) & 305.1e]
Any application form, report, or compliance certification submitted under the County Rules or these Permit Conditions shall contain certification by a responsible official of truth, accuracy, and completeness of the application form or report as of the time of submittal. This certification and any other certification required under the County Rules or these Permit

Conditions shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

4. COMPLIANCE:

A. COMPLIANCE REQUIRED:

1) The Permittee must comply with all conditions of this permit and with all applicable requirements of Arizona air quality statutes and the air quality rules. Compliance with permit terms and conditions does not relieve, modify, or otherwise affect the Permittee's duty to comply with all applicable requirements of Arizona air quality statutes and the Maricopa County Air Pollution Control Regulations. Any permit non-compliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. Noncompliance with any federally enforceable requirement in this Permit constitutes a violation of the Act. [This Condition is federally enforceable if the condition or requirement itself is federally enforceable and only locally enforceable if the condition or requirement itself is locally enforceable only]

[County Rule 210 §§301.8b(4) & 302.1h(1)]

2) The Permittee shall halt or reduce the permitted activity in order to maintain compliance with applicable requirements of Federal laws, Arizona laws, the County Rules, or other conditions of this Permit.

[County Rule 210 §302.1h(2)]

3) For any major source operating in a nonattainment area for any pollutant(s) for which the source is classified as a major source, the source shall comply with reasonably available control technology (RACT) as defined in County Rule 100.

[County Rule 210 §302.1(h)(6)] [SIP Rule 220 §302.2]

4) For any major source operating in a nonattainment area designated as serious for PM_{10}, for which the source is classified as a major source for PM_{10}, the source shall comply with the best available control technology (BACT), as defined in County Rule 100.

[County Rule 210 §302.1(h)(7)]

B. COMPLIANCE CERTIFICATION REQUIREMENTS: [County Rule 210 §305.1d] The Permittee shall file an annual compliance certification with the Control Officer and also with the Administrator of the USEPA. The report shall certify compliance with the terms and conditions contained in this Permit, including emission limitations, standards, or work practices. The certification shall be on a form supplied or approved by the Control Officer and shall include each of the following:

1) The identification of each term or condition of the permit that is the basis of the certification;
2) The compliance status;
3) Whether compliance was continuous or intermittent;
4) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
5) Other facts as the Control Officer may require to determine the compliance status of the source.

The annual certification shall be filed at the same time as the second semiannual monitoring report required by the Specific Condition section of these Permit Conditions and every 12 months thereafter.

C. COMPLIANCE PLAN: [County Rule 210 §305.1g]

Based on the certified information contained in the application for this Permit, the facility is in compliance with all applicable requirements in effect as of the first date of public notice of the proposed conditions for this Permit unless a compliance plan is included in the Specific Conditions section of this Permit. The Permittee shall continue to comply with all applicable requirements and shall meet any applicable requirements that may become effective during the term of this permit on a timely basis. [This Condition is federally enforceable if the applicable requirement itself is federally enforceable and only locally enforceable if the applicable requirement itself is locally enforceable only]

5. CONFIDENTIALITY CLAIMS:

Any records, reports or information obtained from the Permittee under the County Rules or this Permit shall be available to the public, unless the Permittee files a claim of confidentiality in accordance with ARS §49-487(c) which:

A. precisely identifies the information in the permit(s), records, or reports which is considered confidential, and

B. provides sufficient supporting information to allow the Control Officer to evaluate whether such information satisfies the requirements related to trade secrets or, if applicable, how the information, if disclosed, could cause substantial harm to the person's competitive position.

The claim of confidentiality is subject to the determination by the Control Officer as to whether the claim satisfies the claim for trade secrets.

[County Rule 100 §402] [County Rule200 §411]

A claim of confidentiality shall not excuse the Permittee from providing any and all information required or requested by the Control Officer and shall not be a defense for failure to provide such information.

[County Rule 100 §402]

If the Permittee submits information with an application under a claim of confidentiality under ARS §49-487 and County Rule 200, the Permittee shall submit a copy of such information directly to the Administrator of the USEPA.

[County Rule 210 §301.5]

6. CONTINGENT REQUIREMENTS:

NOTE: This Permit Condition covers activities and processes addressed by the CAA which may or may not be present at the facility. This condition is intended to meet the requirements of both Section 504(a) of the 1990 Amendments to the CAA, which requires that Title V permits contain conditions necessary to assure compliance with applicable requirements of the Act as well as the Acid Rain provisions required to be in all Title V permits.

A. ACID RAIN: [County Rule 210 §§302.1b(2) & 302.1f] [County Rule 371 §301]

1). Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the CAA and incorporated under County Rule 371, both provisions shall be incorporated into this Permit and shall be enforceable by the Administrator.

2) The Permittee shall not allow emissions exceeding any allowances that the source lawfully holds under Title IV of the CAA or the regulations promulgated hereunder and incorporated under County Rule 371.

a) No permit revision shall be required for increases in emissions that are authorized by allowances acquired under the acid rain program and incorporated under County Rule 371, provided that such increases do not require a permit revision under any other applicable requirement.
b) No limit is placed on the number of allowances held by the Permittee. The Permittee may not, however, use allowances as a defense to non-compliance with any other applicable requirement.
c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the CAA.
d) All of the following prohibitions apply to any unit subject to the provisions of Title IV of the CAA and incorporated into this Permit under County Rule 371:
    (1) Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners or operators of the unit or the designated representative of the owners or operators.
    (2) Exceedances of applicable emission rates.
    (3) The use of any allowance prior to the year for which it was allocated.
    (4) Violation of any other provision of the permit.

B. ASBESTOS:
[40 CFR 61, Subpart M] [County Rule 370 §301.8 - locally enforceable only]
The Permittee shall comply with the applicable requirements of Sections 61.145 through 61.147 and 61.150 of the National Emission Standard for Asbestos and County Rule 370 for all demolition and renovation projects.

C. RISK MANAGEMENT PLAN (RMP): [40 CFR 68]
Should this stationary source, as defined in 40 CFR 68.3, be subject to the accidental release prevention regulations in 40 CFR Part 68, then the Permittee shall submit an RMP by the date specified in 40 CFR Section 68.10 and shall certify compliance with the requirements of 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR Part 70. However, neither the RMP nor modifications to the RMP shall be considered to be a part of this Permit.

D. STRATOSPHERIC OZONE PROTECTION: [40 CFR 82 Subparts E, F, and G]
If applicable, the Permittee shall follow the requirements of 40 CFR 82.106 through 82.124 with respect to the labeling of products using ozone depleting substances.

If applicable, the Permittee shall comply with all of the following requirements with respect to recycling and emissions reductions:
1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices under 40 CFR 82.156.
2) Equipment used during maintenance, service, repair, or disposal of appliances must meet the standards for recycling and recovery equipment in accordance with 40 CFR 82.158.
3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by a certified technician under 40 CFR 82.161.

If applicable, the Permittee shall follow the requirements of 40CFR 82 Subpart G, including all Appendices, with respect to the safe alternatives policy on the acceptability of substitutes for ozone-depleting compounds.

7. DUTY TO SUPPLEMENT OR CORRECT APPLICATION: [County Rule 210 §301.6]
If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a proposed permit.

8. EMERGENCY EPISODES: [County Rule 600 §302] [SIP Rule 600 §302]
If an air pollution alert, warning, or emergency has been declared, the Permittee shall comply with any applicable requirements of County Rule 600 §302.

9. EMERGENCY PROVISIONS: [County Rule 130 §§201 & 402]
An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that cause the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the requirements of this Permit Condition are met.

The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

A. An emergency occurred and that the Permittee can identify the cause or causes of the emergency;
B. At the time of the emergency, the permitted source was being properly operated;
C. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in this permit; and
D. The Permittee as soon as possible telephoned the Control Officer, giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirement of County Rule 210 §302.1.e(2) with respect to deviation reporting. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

This provision is in addition to any emergency or upset provision contained in any applicable requirement.

10. EXCESS EMISSIONS: [County Rule 140 §§103, 401 & 402]
NOTE: There are reporting requirements associated with excess emissions. These requirements are contained in the Reporting section of the General Permit Conditions in a

subparagraph called Excess Emissions. The definition of excess emissions can be found in County Rule 100 §200.

A. Exemptions: The excess emissions provisions of this Permit Condition do not apply to the following standards and limitations:

1) Promulgated pursuant to Section 111 (Standards Of Performance for New Stationary Sources) of the Clean Air Act (Act) or Section 112 (National Emission Standards For Hazardous Air Pollutants) of the Act;
2) Promulgated pursuant to Title IV (Acid Deposition Control) of the Act or the regulations promulgated hereunder and incorporated under Rule 371 (Acid Rain) of these rules or Title VI (Stratospheric Ozone Protection) of the Act;
3) Contained in any Prevention Of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the Environmental Protection Agency (EPA);
4) Included in a permit to meet the requirements of Rule 240 (Permit Requirements For New Major Sources And Major Modifications To Existing Major Sources), Subsection 308.1(e) (Permit Requirements For Sources Located In Attainment And Unclassified Areas) of these rules.

B. Affirmative Defense For Malfunctions: Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The owner and/or operator of a source with emissions in excess of an applicable emission limitation due to malfunction has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:

1) The excess emissions resulted from a sudden and unavoidable breakdown of the process equipment or the air pollution control equipment beyond the reasonable control of the operator;
2) The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
3) If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, then the owner and/or operator satisfactorily demonstrated that such measures were impractical;
4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
6) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
7) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in County Rule 510 that could be attributed to the emitting source;
8) The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;

9) All emissions monitoring systems were kept in operation, if at all practicable; and
10) The owner's and/or operator's actions in response to the excess emissions were documented by contemporaneous records.

C. Affirmative Defense For Startup And Shutdown:
1) Except as provided in paragraph 2) below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The owner and/or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:
a. The excess emissions could not have been prevented through careful and prudent planning and design;
b. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
c. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable, during periods of such emissions;
e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
f. During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in County Rule 510 (Air Quality Standards) that could be attributed to the emitting source;
g. All emissions monitoring systems were kept in operation, if at all practicable; and
h. The owner's and/or operator's actions in response to the excess emissions were documented by contemporaneous records.

2) If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to paragraph A. of this Permit Condition.

D. Affirmative Defense For Malfunctions During Scheduled Maintenance: If excess emissions occur due to malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to paragraph B. of this Permit Condition.

E. Demonstration Of Reasonable And Practicable Measures: For an affirmative defense under paragraphs A and B of this Permit Condition, the owner and/or operator of the source shall demonstrate, through submission of the data and information required by this Permit Condition and the excess emissions reporting requirements of these Permit Conditions, that all reasonable and practicable measures within the owner's

and/or operator's control were implemented to prevent the occurrence of the excess emissions.

11. FEES: [County Rule 200 §409] [County Rule 210 §§302.1i & 401]
The Permittee shall pay fees to the Control Officer under ARS 49-480(D) and County Rule 280.

12. MODELING: [County Rule 200 §407] [locally enforceable only]
Where the Control Officer requires the Permittee to perform air quality impact modeling, the Permittee shall perform the modeling in a manner consistent with the "Guideline on Air Quality Models (Revised)" (EPA-450/2-78-027R, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, N.C. 27711, July 1986) and "Supplement B to the Guideline on Air Quality Models" (U.S. Environmental Protection Agency, September 1990). Both documents shall be referred to hereinafter as "Guideline", and are adopted by reference. Where the person can demonstrate that an air quality impact model specified in the guideline is inappropriate, the model may be modified or another model substituted if found to be acceptable to the Control Officer.

13. MONITORING / TESTING:

A. The Permittee shall monitor, sample, or perform other studies to quantify emissions of regulated air pollutants or levels of air pollution that may reasonably be attributable to the facility if required to do so by the Control Officer, either by Permit or by order in accordance with County Rule 200 §309.
[County Rule 200 §309] [SIP Rule 41]

B. Except as otherwise specified in these Permit Conditions or by the Control Officer, the Permittee shall conduct required testing used to determine compliance with standards or permit conditions established under the County or SIP Rules or these Permit Conditions in accordance with County Rule 270 and the applicable testing procedures contained in the applicable Rule, the Arizona Testing Manual for Air Pollutant Emissions or other approved USEPA test methods.
[County Rule 200 §408] [County Rule 210 §302.1.c] [County Rule 270 §§300 & 400] [SIP Rule 27]

C. The owner or operator of a permitted source shall provide, or cause to be provided, performance testing facilities as follows:
1) Sampling ports adequate for test methods applicable to such source.
2) Safe sampling platform(s).
3) Safe access to sampling platforms(s).
4) Utilities for sampling and testing equipment.
[County Rule 270 §405] [SIP Rule 42]

14. PERMITS:

A. BASIC: [County Rule 210 §302.1h(3)]
This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

B. DUST CONTROL PLAN REQUIREMENTS:

(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee needs to have the routine dust generating activity covered as part of this Permit. Nonroutine activities, such as construction, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.)

1) The Permittee must first submit a Dust Control Plan and obtain the Control Officer's approval of the Dust Control Plan before commencing any routine dust generating operation.

[County Rule 310 §303.3] [SIP Rule 310 §303.3]

2) A Dust Control Plan shall not be required to play on a ball field and/or for landscape maintenance. For the purpose of this Permit Condition, landscape maintenance does not include grading, trenching, nor any other mechanized surface disturbing activities.

[County Rule 310 §303.4] [SIP Rule 310 §303.4]

3) Any Dust Control Plan shall, at a minimum, contain all the information described in Section 304 of Rule 310.

[County Rule 310 §§303.1 & 304] [SIP Rule 310 §303.1 & 304]

4) Regardless of whether an approved Dust Control Plan is in place or not, the Permittee is still subject to all requirements of Rule 310 at all times.

[County Rule 310 §303] [SIP Rule 310 §303]

C. PERMITS AND PERMIT CHANGES, AMENDMENTS AND REVISIONS:

1) The Permittee shall comply with the Administrative Requirements of Section 400 of County Rule 210 for all changes, amendments and revisions at the facility for any source subject to regulation under County Rule 200, shall comply with all required time frames, and shall obtain any required preapproval from the Control Officer before making changes. All applications shall be filed in the manner and form prescribed by the Control Officer. The application shall contain all the information necessary to enable the Control Officer to make the determination to grant or to deny a permit or permit revision including information listed in County Rule 200 §308 and County Rule 210 §§301 & 302.3.

[County Rule 200 §§301 & 308] [County Rule 210 §§301.4a, b, c, & 400]

2) The Permittee shall supply a complete copy of each application for a permit, a minor permit revision, or a significant permit revision directly to the Administrator of the USEPA. The Control Officer may require the application information to be submitted in a computer-readable format compatible with the Administrator's national database management system.

[County Rule 210 §§303.1a, 303.2, 405.4, & 406.4]

3) While processing an application, the Control Officer may require the applicant to provide additional information and may set a reasonable deadline for a response.

[County Rule 210 §301.4f]

4) No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

[County Rule 210 §302.1j]

D. POSTING:

1) The Permittee shall keep a complete permit clearly visible and accessible on the site where the equipment is installed.

[County Rule 200 §311]

2) If a Dust Control Plan, as required by Rule 310, has been approved by the Control Officer, the Permittee shall post a copy of the approved Dust Control Plan in a conspicuous location at the work site, within on-site equipment, or in an on-site vehicle, or shall otherwise keep a copy of the Dust Control Plan available on site at all times.

[County Rule 310 §401] [SIP Rule 310 §401]

E. PROHIBITION ON PERMIT MODIFICATION: [County Rule 200 §310]
The Permittee shall not willfully deface, alter, forge, counterfeit, or falsify this permit.

F. RENEWAL:

1) The Permittee shall submit an application for the renewal of this Permit in a timely and complete manner. For purposes of permit renewal, a timely application is one that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. A complete application shall contain all of the information required by the County Rules including Rule 200 §308 and Rule 210 §§301 & 302.3.

[County Rule 210 §§301.2a, 301.4a, b, c, d, h & 302.3]

2) The Permittee shall file all permit applications in the manner and form prescribed by the Control Officer. To apply for a permit renewal, the Permittee shall complete the "Standard Permit Application Form" and shall supply all information, including the information required by the "Filing Instructions" as shown in Appendix B of the County Rules, which is necessary to enable the Control Officer to make the determination to grant or to deny a permit which shall contain such terms and conditions as the Control Officer deems necessary to assure a source's compliance with the requirements of the CAA, ARS and County Rules.

[County Rule 200 §§308 & 309] [County Rule 210 §301.1]

3) The Control Officer may require the Permittee to provide additional information and may set a reasonable deadline for a response.

[County Rule 210 §301.4f]

4) If the Permittee submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit, by the deadline specified by the Control Officer, any additional information identified as being needed to process the application.

[County Rule 200 §403.2] [County Rule 210 §§301.4f & 301.9]

G. REVISION / REOPENING / REVOCATION:

1) This permit shall be reopened and revised to incorporate additional applicable requirements adopted by the Administrator pursuant to the CAA that become applicable to the facility if this permit has a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this Permit is due to expire unless the original permit or any of its terms have been extended pursuant to Rule 200 §403.2.

[County Rules 200 §402.1]

Any permit revision required under this Permit Condition, 14.G.1, shall reopen the entire permit and shall comply with provisions in County Rule 200 for permit renewal *(Note: this includes a facility wide application and public comment on the entire permit)* and shall reset the five year permit term.

[County Rules 200 §402.1a(1) & 210 §302.5]

2) This permit shall be reopened and revised under any of the following circumstances:
   a) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Title V permit.
   b) The Control Officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
   c) The Control Officer or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue a permit under this Permit Condition, 14.G.2, shall follow the same procedures as apply to initial permit issuance and shall effect only those parts of the Permit for which cause to reopen exists.

[County Rule 200 §402.1]

3) This permit shall be reopened by the Control Officer and any permit shield revised, when it is determined that standards or conditions in the permit are based on incorrect information provided by the applicant.

[County Rule 210 §407.3]

4) This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[County Rule 210 §302.1h(3)]

H. REVISION UNDER A FEDERAL HAZARDOUS AIR POLLUTANT STANDARD:

[County Rule 210 §301.2c] [locally enforceable only]

If the Permittee becomes subject to a standard promulgated by the Administrator under Section 112(d) of the CAA, the Permittee shall, within 12 months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

I. REQUIREMENTS FOR A PERMIT:

1) Air Quality Permit: Except as noted under the provisions in Sections 403 and 405 of County Rule 210, no source may operate after the time that it is required to submit a timely and complete application, except in compliance with a permit issued under County Rule 210. Permit expiration terminates the Permittee's right to operate. However, if a source submits a timely and complete application, as defined in County Rule 210 §301, for permit issuance, revision, or renewal, the source's failure to have a permit is not a violation of the County Rules until the Control Officer takes final action on the application. The Source's ability to operate without a permit as set forth in this paragraph shall be in effect from the date the application is determined to be complete until the final permit is issued. This protection shall cease to apply if, subsequent to the completeness determination, the applicant fails to submit, by the deadline specified in writing by the Control Officer, any additional information identified as being needed to process the application. If a source submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the permit renewal has been issued or denied.

[County Rule 210 §301.9]

2) Earthmoving Permit:

(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee needs to have the routine dust generating activity covered as part of this Permit. Non-routine activities, such as construction, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.)

The Permittee shall not cause, commence, suffer, allow, or engage in any earthmoving operation that disturbs a total surface area of 0.10 acre or more without first obtaining a permit from the Control Officer. Permits shall not be required for earthmoving operations for emergency repair of utilities, paved roads, unpaved roads, shoulders, and/or alleys.

[County Rule 200 §305]

3) Burn Permit: The Permittee shall obtain a Permit To Burn from the Control Officer before conducting any open outdoor fire except for the activities listed in County Rule 314 §§302.1 and 302.2.

[County Rule 314] [County Rule 200 §306] [SIP Rule 314]

J. RIGHTS AND PRIVILEGES: [County Rule 210 §302.1h (4)]

This Permit does not convey any property rights nor exclusive privilege of any sort.

K. SEVERABILITY: [County Rule 210 §302.1g]

The provisions of this Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

L. SCOPE:

The issuance of any permit or permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a permit or permit revision required under the County Rules.

[County Rule 200 §308]

Nothing in this permit shall alter or affect the following:

1) The provisions of Section 303 of the Act (Emergency Orders), including the authority of the Administrator of the USEPA under that section.
2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act.
4) The ability of the Administrator of the USEPA or of the Control Officer to obtain information from the Permittee under Section 114 of the Act, or any provision of State law.
5) The authority of the Control Officer to require compliance with new applicable requirements adopted after the permit is issued. [locally enforceable only]

[County Rule 210 §407.2]

M. TERM OF PERMIT: [County Rule 210 §§302.1a & 402]
This Permit shall remain in effect for no more than 5 years from the date of issuance.

N. TRANSFER: [County Rule 200 §404]
Except as provided in ARS §49-429 and County Rule 200, this permit may be transferred to another person if the Permittee gives notice to the Control Officer in writing at least 30 days before the proposed transfer and complies with the permit transfer requirements of County Rule 200 and the administrative permit amendment procedures under County Rule 210.

15. RECORDKEEPING:

A. RECORDS REQUIRED:
[County Rule 100 §501] [County Rule 310 §502] [SIP Rule 40 A]
The Permittee shall maintain records of all emissions testing and monitoring, records detailing all malfunctions which may cause any applicable emission limitation to be exceeded, records detailing the implementation of approved control plans and compliance schedules, records required as a condition of any permit, records of materials used or produced, and any other records relating to the emission of air contaminants which may be requested by the Control Officer.

B. RETENTION OF RECORDS:
Unless a longer time frame is specified by these Permit Conditions, information and records required by applicable requirements and copies of summarizing reports recorded by the Permittee and submitted to the Control Officer shall be retained by the Permittee for 5 years after the date on which the information is recorded or the report is submitted

[County Rule 100 §504] [SIP Rule 40 C]

The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[County Rule 210 §§302.1d(2)]

C. MONITORING RECORDS: [County Rule 210 §302.1d(1) & 305.1b]

Records of any monitoring required by this Permit shall include the following:

1) The date, place as defined in the permit, and time of sampling or measurements;
2) The date(s) analyses were performed;
3) The name of the company or entity that performed the analysis;
4) The analytical techniques or methods used;
5) The results of such analysis; and
6) The operating conditions as existing at the time of sampling or measurement.

D. RIGHT OF INSPECTION OF RECORDS: [County Rule 100 §106] [SIP Rule 40 D]
When the Control Officer has reasonable cause to believe that the Permittee has violated or is in violation of any provision of County Rule 100 or any County Rule adopted under County Rule 100, or any requirement of this permit, the Control Officer may request, in writing, that the Permittee produce all existing books, records, and other documents evidencing tests, inspections, or studies which may reasonably relate to compliance or noncompliance with County Rules adopted under County Rule 100. No person shall fail nor refuse to produce all existing documents required in such written request by the Control Officer.

16. REPORTING:

NOTE: See the Permit Condition titled Certification Of Truth, Accuracy and Completeness in conjunction with reporting requirements.

A. ANNUAL EMISSION INVENTORY REPORT:
[County Rule 100 §505] [SIP Rule 40 B]
Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall complete and shall submit to the Control Officer an annual emissions inventory report. The report is due by April 30, or 90 days after the Control Officer makes the inventory form(s) available, whichever occurs later.

The annual emissions inventory report shall be in the format provided by the Control Officer.

The Control Officer may require submittal of supplemental emissions inventory information forms for air contaminants under ARS §49-476.01, ARS §49-480.03 and ARS §49-480.04.

B. DATA REPORTING: [County Rule 100 §502]
When requested by the Control Officer, the Permittee shall furnish to the Maricopa County Air Quality Division (Division hereafter) information to locate and classify air contaminant sources according to type, level, duration, frequency, and other characteristics of emissions and such other information as may be necessary. This information shall be sufficient to evaluate the effect on air quality and compliance with the County or SIP Rules. The Permittee may subsequently be required to submit annually, or at such intervals specified by the Control Officer, reports detailing any changes in the nature of the source since the previous report and the total annual quantities of materials used or air contaminants emitted.

C. DEVIATION REPORTING: [County Rule 210 §§302.1e & 305.1c]
The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions. Unless specified otherwise elsewhere in these Permit Conditions, an upset for the purposes of this Permit Condition shall be defined

as the operation of any process, equipment or air pollution control device outside of either its normal design criteria or operating conditions specified in this Permit and which results in an exceedance of any applicable emission limitation or standard. The Permittee shall submit the report to the Control Officer within 2 working days from knowledge of the deviation. The report shall contain a description of the probable cause of such deviations and any corrective actions or preventive measures taken. In addition, the Permittee shall report within a reasonable time of any long-term corrective actions or preventative actions taken as the result of any deviations from permit requirements.

All instances of deviations from the requirements of this Permit shall also be clearly identified in the semiannual monitoring reports required in the Specific Condition section of these Permit Conditions.

D. EMERGENCY REPORTING: [County Rule 130 §402.4]

(NOTE: Emergency Reporting is one of the special requirements which must be met by a Permittee wishing to claim an affirmative defense under the emergency provisions of County Rule 130. These provisions are listed earlier in these General Conditions in the section titled "Emergency Provisions". Since it is a form of deviation reporting, the filing of an emergency report also satisfies the requirement of County Rule 210 to file a deviation report.)

The Permittee shall, as soon as possible, telephone the Control Officer giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

E. EMISSION STATEMENTS REQUIRED AS STATED IN THE ACT:
[County Rule 100 §503]

Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall provide the Control Officer with an emission statement, in such form as the Control Officer prescribes, showing measured actual emissions or estimated actual emissions of NO_x and volatile organic compounds (VOC) from that source. At a minimum, the emission statement shall contain all information contained in the "Guidance on Emission Statements" document as described in the USEPA's Aerometric Information Retrieval System (AIRS) Fixed Format Report (AFP 644). The statement shall contain emissions for the time period specified by the Control Officer. Statements shall be submitted annually.

F. EXCESS EMISSIONS REPORTING:
[County Rule 140 §500] [locally enforceable only]

(NOTE: This reporting subsection is associated with the requirements listed earlier in these General Conditions in the section titled "Excess Emissions".)

1) The owner and/or operator of any source shall report to the Control Officer any emissions in excess of the limits established by the County or SIP Rules or by these Permit Conditions. The report shall be in two parts as specified below:
   a) Notification by telephone or facsimile within 24 hours of the time when the owner and/or operator first learned of the occurrence of excess emissions that includes all available information from paragraph 2) of this Permit Condition.

b) Detailed written notification by submission of an excess emissions report within 72 hours of the notification required by paragraph 1) a) of this Permit Condition.

2) The excess emissions report shall contain the following information:
   a) The identity of each stack or other emission point where the excess emissions occurred;
   b) The magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
   c) The time and duration or expected duration of the excess emissions;
   d) The identity of the equipment from which the excess emissions emanated;
   e) The nature and cause of such emissions;
   f) The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions;
   g) The steps that were or are being taken to limit the excess emissions; and
   h) If this Permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the Permit procedures.

3) In the case of continuous or recurring excess emissions, the notification requirements of this Permit Condition shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to paragraphs 1) and 2) of this Permit Condition.

G. OTHER REPORTING: [County Rule 210 §302.1h(5)]
The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing this permit, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records directly to the Administrator of the USEPA along with a claim of confidentiality as covered elsewhere in these Permit Conditions.

17. RIGHT TO ENTRY AND INSPECTION OF PREMISES:

The Control Officer, during reasonable hours, for the purpose of enforcing and administering County Rules or any provision of ARS relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private residences. Every person is guilty of a petty offense under ARS §49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.

[County Rule 100 §105]

The Permittee shall allow the Control Officer or his authorized representative, upon presentation of proper credentials and other documents as may be required by law, to:

A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

[County Rule 210 §305.1f] [SIP Rule 43]

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

[County Rule 210 §305.1f] [SIP Rule 43]

C. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

[County Rule 210 §305.1f] [SIP Rule 43]

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

[County Rule 210 §305.1f] [SIP Rule 43]

E. To record any inspection by use of written, electronic, magnetic, and photographic media.

[County Rule 210 §305.1f] [Locally enforceable only]

SPECIFIC CONDITIONS:

18. ALLOWABLE EMISSIONS LIMITATIONS

The allowable emission limitations of these Permit Conditions are based upon the facility as presently constructed and operated. They do not provide for facility changes or changes in the method of operation that would otherwise trigger new applicable requirements including New Source Review (NSR) or Best Available Control Technology (BACT).

A. Facility-Wide Requirements

1) Volatile Organic Compound (VOC) Emissions

The Permittee shall not cause, allow, or permit VOC emissions to exceed the following emission limits for VOC;

a) Five (5.0) tons per calendar month

b) Forty-five (45.0) tons per rolling 12 month period.

[County Rule 210 §301.8b][County Rule 240]

2) Particulate Matter Limits

Wood Furniture Manufacturing

a) The Permittee shall not discharge or cause or allow the discharge of particulate matter into the ambient air from any affected operation in excess of the allowable hourly emission rate determined by the following equation:

$$E = 3.59\ P^{0.62}$$ **Equation (1)**

Where:

E = Emissions in pounds per hour, and

P = Process weight rate in tons per hour.

[County Rule 311 §301.1][SIP Rule 311 §301.1]

The total process weight from all similar operations at a facility, plant or premises shall be used for determining the maximum allowable emissions of particulate matter.

[County Rule 311 §302][SIP Rule 311 §302]

b) In the event that the Permittee may exceed the applicable standard set forth in County Rule 311 §301.1, the Permittee must comply by installing and operating an approved emission control system.

[County Rule 311 §304][SIP Rule 311 §304]

3) Opacity Limits

a) The Permittee shall not discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20 percent opacity, except as provided in County Rule 300 §302.

[County Rule 300 §§301 and 302][locally enforceable only]

b) Except as otherwise provided in Regulation I, Rule 4, Exceptions, the opacity of any plume or effluent from any source of emissions, other than uncombined water, shall not be greater than 40 percent opacity as determined by Reference Method 9 in the Arizona Testing Manual.

[SIP Rule 30]

4) HAP Emission Limits

a) The Permittee shall limit VHAP emissions from finishing operations by achieving a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids) of no greater than 1.0

To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the Permittee shall use the methods presented in 40 CFR §63.803(1) and Permit Condition 24.B.12(b) for determining styrene and formaldehyde usage.

[40 CFR §63.802(a)(1)][County Rule 370 §302.26]

b) The Permittee shall limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:

(1) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied; or

(2) For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented for foam adhesives above**,** but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.

[40 CFR §63.802(a)(2)][County Rule 370 §302.26]

c) The Permittee shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

[40 CFR §63.802(a)(3)][County Rule 370 §302.26]

19. OPERATIONAL LIMITATIONS AND STANDARDS

A. Facility-Wide Operational Requirements

1) The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.

[County Rule 320 §300][locally enforceable only]

2) Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalis, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices or equipment shall be mandatory.

[County Rule 320 §302][SIP Rule 32C]

3) Where a stack, vent or other outlet is at such a level that air contaminants are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet to a degree that will adequately dilute, reduce or eliminate the discharge of air contaminants to adjoining property.

[County Rule 320 §303][SIP Rule 32D]

B. Operational Requirements for Woodworking Equipment Vented Outdoors

The Permittee shall install, operate and maintain an approved emission control device on all wood working equipment vented outdoors. Such woodworking equipment shall be vented to the device without bypass. This requirement does not apply to any hand held equipment.

[County Rule 100 §301] [SIP Rule 3][County Rule 311§304]

C. Operational Requirements for Baghouses

1) The Permittee shall operate and maintain each baghouse in accordance with the requirements of the Operations and Maintenance (O&M) Plan for that piece of equipment most recently approved in writing by the control officer.

[County Rule 210 §302.1c][County Rule 311 §305][SIP Rule 311 §306]

2) The Permittee shall operate and maintain each baghouse with a removal efficiency of at least 99.5 % for particulate matter with an aerodynamic diameter of 100 microns or less or, if this efficiency is not demonstrated during the emission tests required by these Permit Conditions, the Permittee may demonstrate compliance with Rule 311 using the emission rates from the emission control devices as determined by the testing required by these permit conditions.

[County Rule 311 §305][SIP Rule 311 §306]

3) Measurement of a pressure differential outside of the applicable parametric range of 1.0 to 6.0 inches of water shall require the Permittee to investigate and take corrective action if necessary to bring the control device into proper operation. Upon replacement of the bags in the baghouse, the differential pressure reading

may be between 0.5 to 1.0 inches of water for a period of (7) days. The Permittee must record the dates of bag changes and pressure drop readings taken during this time.

[County Rule 311 §305][SIP Rule 311 §306]

D. Operational Requirements for Cyclone

[County Rule 210 §302.1c][County Rule 311 §305][SIP Rule 311 §306]

1) The The Permittee shall operate and maintain each cyclone in accordance with the requirements of the Operations and Maintenance (O&M) Plan for that piece of equipment most recently approved in writing by the control officer.

2) The Permittee shall operate the cyclone with a removal efficiency of at least ninety percent (90%) for particulate matter with an aerodynamic diameter of 100 microns or less or, if this efficiency is not demonstrated during the emission tests required by these Permit Conditions the Permittee may demonstrate compliance with Rule 311 using the emission rates from the emission control devices as determined by the testing required by these permit conditions.

3) The Permittee shall operate and maintain the cyclones in operating range of eight (8) to ten (10) inches of gauge water pressure.

E. Operational Requirements for Spray Coating Equipment

[County Rule 315 §301][locally enforceable only]

1) The Permittee shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:
   a) The Permittee shall not operate spray coating equipment outside of a building unless it is operated inside an enclosure which has at least three sides a minimum of eight feet in height and able to contain any object(s) being coated.
      (1) For three-sided enclosures, the Permittee shall direct the spray in a horizontal or downward pointing manner so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.
      (2) For enclosures with three sides and a roof, or for complete enclosures, the Permittee shall direct the spray into the enclosure so that the overspray is directed away from any opening in the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of any open top of the enclosure.
   b) The Permittee shall install and operate a filtering system on any spray booth or enclosure with forced air exhaust.
      (1) The filtering system shall have an average overspray removal efficiency of at least ninety-two percent (92%) by weight, as specified in writing by the manufacturer, for the type of material being sprayed.
      (2) No gaps, sags or holes shall be present in the filters and all exhaust must be discharged into the atmosphere.

[County Rule 315 §301.2][locally enforceable only]

2) The controls required for spray coating in County Rule 315 §301, and the conditions of this Permit based upon that requirement, above, shall not apply:
   a) To the spray coating of buildings or dwellings, including appurtenances and any other ornamental objects that are not normally removed prior to coating;
   b) To the spray coating of facility equipment or structures which are fixed in a permanent location and cannot easily be moved into an enclosure or spray booth and which are not normally dismantled or moved prior to coating;
   c) To the spray coating of objects which cannot fit inside of an enclosure with internal dimensions of 10'W x 25'L x 8'H;
   d) To enclosures and spray booths and exhausts located entirely in a completely enclosed building, providing that any vents or openings do not allow overspray to be emitted into the outside air; or
   e) To any coating operations utilizing only hand-held aerosol cans.

[County Rule 315 §302][locally enforceable only]

F. Operational Requirements for Coating Wood Furniture and Fixtures

1) VOC Content Limitation [County Rule 342 §301.1][SIP Rule 342 §301.1]
The Permittee shall not apply a topcoat or sealer to wood furniture or fixtures unless the VOC content is limited either to the pounds of VOC per pound of solids (kilogram VOC per kilogram of solids) in Column A, or to the grams of VOC per liter in Column B of Table 342-1 below, unless covered by an exemption listed in these permit conditions.

Table 342-1: General VOC Limits of Coatings

Type of Coating	Column A (pounds of VOC per pound of solids)	Column B (grams of VOC per liter, less non-precursor compounds and water)
Topcoat	1.8	635
Sealer	1.9	645
Acid-cured, alkyd amino topcoat	2.0	655
Acid-cured, alkyd amino vinyl sealer	2.3	680

2) When a sealer's topcoat does not exceed 0.8 pound of VOC per pound of solids (0.8 kilogram of VOC per kilogram of solids), there is no limit on the VOC content of the sealer.

[County Rule 342 §301.1b][SIP Rule 342 §301.1b]

3) Stains, washcoats, glazes, toners, inks, and other coatings not specified in Table 342-1 or the strippable booth coating requirements of these Permit Conditions, do not have limits on VOC content.

[County Rule 342 §301.2][SIP Rule 342 §301.2]

4) The Permittee shall not use a strippable booth coating unless, as applied, the coating has no more than 0.8 pounds of VOC per pound of solids or no more

than 3.0 pounds of VOC per gallon (360 grams per liter), less non-precursor volatile compounds.

[County Rule 342 §301.2][SIP Rule 342 §301.2]

5) Spray Equipment Requirements for Coating Wood Furniture and Fixtures

a) The Permittee shall not spray wood furniture with coating exceeding 1.0 pound of VOC per pound of solids (1.0 kilogram of VOC per kilogram of solids) without providing evidence of possession and use of a low-pressure spray gun or system, an electrostatic system, or a system in which the energy for atomization is provided principally via hydraulic pressure; this includes air assisted airless and ultra-low-volume-air assisted technologies. Such requirement does not apply to any facility, activity or person specifically exempted by applicable subsections of County Rule 342 § 307, or to any specific system that is approved by the Administrator as having a transfer efficiency consistently exceeding 64 percent.

[County Rule 342 §302.1][SIP Rule 342 §302.1]

b) The Permittee shall not use a conventional air-atomized spray gun or other restricted use gun, except:

(1) To apply finishing materials that have a VOC content not exceeding 1.0 pound of VOC per pound of solids (1.0 kilogram of VOC per kilogram of solids).

[County Rule 342 §302.2a][40 CFR 63.803 (h)(1)]
[SIP Rule 342 §302.2a]

(2) For touch-up and repair under either of the following conditions:

(a) Such application is performed after completion of the entire finishing operation; or

(b) Such application is performed after applying stain and before any further coating, by equipment having a total capacity not exceeding 2.1 gallons (or 8 liters).

[County Rule 342 §302.2c] [40 CFR 63.803 (h)(2)]
[SIP Rule 342 §302.2c]

(3) To apply less than five percent (5%) of all coating pursuant to County Rule 342 §307.2.e.

[County Rule 342 §302.2d] [40 CFR 63.803 (h)(5)]
[SIP Rule 342 §302.2d]

c) The Permittee shall operate and maintain in proper working order all process equipment in which VOC-containing materials are used or stored.

[County Rule 342 §303][SIP Rule 342 §303]

6) Booth Cleaning [County Rule 342 §304.1][SIP Rule 342 §304.1]
[County Rule 370 §304.1][40 CFR 63.803 (f)]

a) The Permittee shall not clean spray booth components using a solvent containing more than 8.0 percent by weight of VOCs, including water and non-precursor compounds, except for: conveyors, continuous coaters and their enclosures, and metal filters.

b) If the spray booth coating is being replaced, the Permittee shall use no

more than 1.0 gallon (3.8 liters) VOC- solvent to clean the booth.

7) Cleaning Guns and Lines [County Rule 342 §304.2][SIP Rule 342 §304.2] [County Rule 370 §302.26][40 CFR 63.803 (i) and (j)]

The Permittee shall collect all solvent used to clean spray guns and shall pump or drain all solvent used for line cleaning into non-leaking container(s). Such containers shall be immediately closed or covered after all the solvent has been collected, and shall remain so except when in use.

8) Handling and Disposal of VOC [County Rule 342 §305][40 CFR 63.803 (g)] [SIP Rule 342 §305]

a) The Permittee shall cover and keep covered each VOC-containing material intended for the day's production, which is not currently in use. The Permittee shall store finishing and cleaning materials in closed containers.

b) The Permittee also shall store all VOC-containing materials, including but not limited to rags, waste coatings, waste solvents and their residues, in closed containers which are legibly labeled with their contents and which remain covered when not in use.

9) Exemptions from VOC Requirements for Coating Wood Furniture and Fixtures [County Rule 342 §§307 and 403][SIP Rule 342 §§307 and 403]

a) Total Exemption:
The following materials are exempt from the requirements of this Permit which are based on County Rule 342: adhesives, architectural coatings, printing ink, and coatings not applied on or over a wood-product substrate.

b) Partial Exemptions:

(1) Coatings in aerosol spray cans not exceeding 22 fl. oz. (0.66 liter) capacity used exclusively for touch-up and/or repairs are exempt from all requirements of Section 300 of County Rule 342 and the conditions of this permit that are based upon those requirements.

(2) The following shall be exempt from the requirements of County Rule 342 §§301 and 302 and the conditions of this permit that are based upon those requirements:

(a) Prepackaged aerosol spray cans which are not used for touch-up or repair, metal leaf finishes, and faux finishes do not have limits on VOC content when the annual total use of all such coating types together is less than 250 gallons (948 liters).

(b) Any refinishing operation necessary for preservation, to return the furniture or fixture to original condition, to replace missing furniture to produce a matching set, or to produce custom replica furniture.

(3) The coating for a single resin-layer finish which does not exceed a VOC limit of 3 pounds of VOC per pound of solids for completed finishes up to 3 dry mils thickness or does not exceed 2.3 pounds of VOC per pound of solids for finishes over 3 dry mils is exempt from the requirements of County Rule 342 §301.1 and the conditions of this Permit that are based upon those requirements if all of the following conditions are met:

(a) The containers are clearly marked: “FOR USE IN SINGLE

RESIN-LAYER FINISH,"

(b) Facility records clearly identify this material: "DOES NOT MEET THE VOC LIMITS OF SECTION 301, RULE 342 - FOR USE ONLY IN SINGLE RESIN-LAYER FINISHES," and

(c) The booth used to apply a single resin-layer finish above 2.3 pounds of VOC per pound of solids is dedicated to that operation only, and is clearly labeled: "FOR SINGLE RESIN-LAYER FINISHES ONLY."

(4) In addition to the uses of restricted-use guns allowed under County Rule 342 §302.2 and the conditions of this permit based upon that requirement, the Permittee may use a conventional air atomized or other restricted use gun to apply coatings exceeding 1 lb VOC/lb if all the following conditions are met:

(a) The volume of such coating applied in this way is less than five percent (5%) of the total volume of coating applied at the facility;

(b) Each gun has a red tag when spraying materials exceeding 1.0 pound of VOC per pound of solids. The red tag shall be a red 4 square-inch vivid, durable tag, sticker, or painted emblem/label visible on the gun or within 3 feet of the gun on the gun's hose;

(c) A log shall be kept of the amount of coating used by each such gun pursuant to the Recordkeeping Requirements of these Permit Conditions.

20. MONITORING AND RECORDKEEPING REQUIREMENTS

A. Facility-Wide Requirements [County Rule 210 §302.1c]

1) The Permittee shall monitor for compliance with the facility-wide VOC emissions limits of these Permit Conditions by monthly calculating and recording the monthly and the rolling 12 month emissions of VOCs. The calculations shall be made no later than the end of the following month, unless a different timeframe is specified elsewhere in these permit conditions. All VOCs in the materials used in the woodworking operations are assumed to be emitted into the atmosphere unless records acceptable to the Control Officer are kept documenting the quantity and VOC content of VOC containing materials disposed of off site. The Permittee shall maintain a Guaranteed Product Specification Sheet or other similar documentation of the VOC content of all VOC containing materials used in the woodworking process. The 12 month rolling emissions total shall be calculated by summing the emissions for the most recent complete 12 calendar months. The monthly and rolling 12 month total emissions of VOCs from the facility shall be calculated based upon one of the following two methods.

(a) Upon initial issuance of this permit and anytime thereafter that the 12 month rolling total of VOC emissions from the facility is less than 35 tons, the Permittee may calculate the facility's VOC emissions based upon the usage records for each month. The Permittee shall keep on site purchase records showing the volume of all VOC containing materials purchased each month.

(b) If the 12 month rolling total of VOC emissions from the facility reaches 35 tons or greater, the Permittee shall begin to record and use actual material usage to calculate facility emissions. The monthly calculation of the 12

month rolling total emissions of VOCs under this scenario shall be completed by the 10th of the following month. Monthly emissions calculations under this scenario shall be calculated on a weekly basis and shall be performed by the end of the following week.

2) Opacity Readings

a) Opacity shall be determined by observations of visible emissions conducted in accordance with 40 CFR Part 60 Appendix A, Method 9.

[40 CFR 60.11.b][County Rule 300 §501]

b) Opacity of visible emissions from intermittent sources as defined by County Rule 300 §201 shall be determined by observations conducted in accordance with 40 CFR Part 60 Appendix A, Method 9, except that at least 12 rather than 24 consecutive readings shall be required at 15-second intervals for the averaging time.

[County Rule 300 §502][locally enforceable only]

3) Process Rate Records:

These records shall be updated each day of operation and include at a minimum the following information: a record of the total weight of all process materials including raw materials, additives, fuels, etc., which are put into a process flow at the beginning of each batch process shall be kept on site. This shall include all materials which participate in the process and are changed in mass, form, state or in other characteristics by means of their interaction in the given process. The duration of each separate batch process shall also be recorded.

a) Batch process records:

Maintain a record of the total weight of all process materials including raw materials, additives, and fuels which are put into a process flow at the beginning of each batch process shall be kept. This shall include all materials which participate in the process and are changed in mass, form, state or in other characteristics by means of their interaction in the given process. The duration of each separate batch process shall also be recorded.

b) Continuous or semi-continuous process records:

Maintain a daily record of the weight of all process material entering into each process including raw materials, additives, fuels, the start time and the duration of each process run. In addition to the foregoing, records shall be kept for processes which run continuously for more than 24 hours. Such records shall include the total weight of any material entering into the process over the entire duration of the process run from start up to shut down and the total elapsed time of operation.

[County Rule 311 §502.2][SIP Rule 311 §502.2]

4) Odor Log

[County Rule 100 §301] [County Rule 210 §302.1.c.(2)] [locally enforceable only]

The Permittee shall maintain a log of complaints of odors detected off-site. The log shall contain a description of the complaint, date and time that the complaint was received, and if given, name and/or phone number of the complainant. The logbook shall describe what actions were performed to investigate the complaint, the results of the investigation, and any corrective actions that were taken.

B. Monitoring and Recordkeeping Requirements for the Cyclone and Baghouse Vented Outdoors that Serve Woodworking Equipment

[County Rule 300][County Rule 210 §302.1c][SIP Rule 311 §502.3]

1) The Permittee shall install, operate, and maintain pressure drop gauges on each cyclone and baghouse. The Permittee shall take a daily reading each shift of the pressure drop across the cyclone and baghouse and record such readings. The Permittee shall record periods when the control device is not in use.

2) The Permittee shall log the following information for all visible emissions observations and Method 9 opacity readings required by this permit:
   a) The date and time the visible emissions observation or Method 9 opacity reading was taken;
   b) The name of the observer;
   c) Whether or not visible emissions were present;
   d) If visible emissions are present and the controls and facility processes are operating in a mode other than their normal operating conditions, such as startup or shutdown, a description of the operating conditions at the time that the opacity is observed;
   e) The opacity determined by a Method 9 opacity reading, if a Method 9 reading is required by these permit conditions;
   f) If applicable, a description of any corrective action(s) taken, including the date of such action(s); and
   g) Any other related information.

[County Rule 300] [County Rule 210 §302.1]

3) The Permittee shall conduct a facility walk-through twice daily and observe visible emissions from the cyclone.. This condition shall no longer apply once the new control technology replaces the cyclone in accordance with the Compliance Plan of this permit.

[County Rules 300] [County Rule 210 §302.1c]

4) Daily visible emissions observations shall performed for the baghouse every day the facility operates.

[County Rules 300] [County Rule 210 §302.1c]

5) If visible emissions, other than uncombined water, are observed being discharged into the ambient air, the Permittee shall monitor for compliance with the opacity standards specified in this permit by having a certified visible emissions evaluator determine the opacity of the visible emissions being discharged into the ambient air using the techniques specified in EPA Reference Method 9.

If the Permittee has observed visible emissions, the initial Method 9 opacity reading shall be taken within twenty four (24) hours of observing visible emissions If the emitting equipment is not operating on the day that the initial Method 9 opacity reading is required to be taken, then the initial Method 9 opacity reading shall be taken the next day that the emitting equipment is in operation. If the problem causing the visible emissions is corrected before the initial Method 9 opacity reading is required to be performed, and there are no visible emissions (excluding uncombined water) observed from the previously emitting equipment while the equipment is in normal operation, the Permittee shall not be required to conduct the Method 9 opacity readings.

Follow-up Method 9 opacity readings shall be performed by a certified visible emissions evaluator while the emitting equipment in its standard mode of operation in accordance with the following schedule:

a) Daily:
   (1) Except as provided in the paragraph entitled "Cease Follow-up of Method 9 Opacity Monitoring" of this Permit Condition, a Method 9 opacity reading shall be conducted each day that the emitting equipment is operating until a minimum of 14 daily Method 9 readings have occurred.
   (2) If the Method 9 opacity readings required by this Permit Condition are less than 20% for 14 consecutive days, the frequency of Method 9 opacity readings may be decreased to weekly, in accordance with the paragraph entitled "Weekly" of this Permit Condition.

b) Weekly:
   (1) If the Permittee has obtained 14 consecutive daily Method 9 readings which do not exceed 20% opacity, the frequency of Method 9 readings may be decreased to once per week for any week in which the equipment is operated.
   (2) If the opacity measured during a weekly Method 9 reading exceeds 20%, the frequency of Method 9 opacity readings shall revert to daily, in accordance with the paragraph entitled "Daily" of this Permit Condition.
   (3) If the opacity measured during the required weekly Method 9 readings never exceeds 20%, the Permittee shall continue to obtain weekly opacity readings until the requirements of the paragraph entitled "Cease Follow-up of Method 9 Opacity Monitoring" of this Permit Condition are met.

c) Cease Follow-up Method 9 Opacity Monitoring:
   Regardless of the applicable monitoring schedule, follow-up Method 9 opacity readings may cease if the emitting equipment, while in its standard mode of operation, has no visible emissions, other than uncombined water, during every observation taken during a Method 9 procedure.

[County Rule 210 §302.1c]

6) If information, other than pressure differential reading indicates that the cyclone and baghouse is not being operated in accordance with the O&M plan most recently approved by the Control Officer, the Department may require the Permittee to submit a Corrective Action Plan (CAP).

[County Rule 200 §309]

7) The Control Officer may require the CAP contain one or more of the following elements:
   a) Improved preventive maintenance practices.
   b) Improved cyclone operating practices.
   c) Process operation changes.
   d) Other actions appropriate to improve cyclone performance.
   e) Schedule for CAP implementation and periodic reporting on the progress of CAP implementation.

[County Rule 200 §309]

8) If the Permittee or the Control Officer determines that the pressure drop ranges for the cyclone are not representative of normal operating ranges, the Permittee shall submit a revision to the Permit and O&M Plan to address the necessary revisions within 30 days of such determination. Such amendments shall be sent to the Department, to the attention of Manager, Title V Permits Group.

[County Rule 210 §302.1c]

9) For each day that the woodworking equipment is operated, the Permittee shall record daily pressure differential readings for the baghouse and cyclone, including the date when the reading was taken, the identification of each piece of control equipment, the name or initials of the person who took the reading, and any other related information. The Permittee shall immediately investigate the cause of any reading outside the range specified in the operating requirement section of these Permit Conditions to identify, correct, or repair the problem, and record in a log the cause of the problem and the corrective action initiated to remedy the abnormal pressure differential reading.

[County Rule 311 §305]

C. Monitoring and Recordkeeping Requirements for Spray Coating

[County Rule 210 §§302.1d and 302.1e][County Rule 315]

1) Should the Permittee operate any spray coating equipment inside an enclosure that is located outside of a building, the Permittee shall weekly observe spraying activity occurring in such enclosures to ensure the following:
   a) No spraying is conducted within three feet of any open end, or within two feet of any open top of the enclosure; and
   b) The spray is directed in a horizontal or downward pointing manner for three-sided enclosures, or away from any opening for complete enclosures and three-sided enclosures with roofs.

   The Permittee shall log the results of the inspections, including the name of the person conducting the inspection, the date of the inspection, and any action taken to correct incorrect application, if applicable.
2) The Permittee shall inspect each filter installed on a spray booth or enclosure, for gaps, sags or holes each day of operation.
   a) Should the Permittee observe any gaps, sags or holes in any of the filters, the Permittee shall immediately repair or replace the filter and record the name of the inspector, the location of filtering system containing the filter (if more than one spray booth), and the date that the filter was replaced.
   b) If no gaps, sags or holes are observed in any of the filters, the Permittee shall record the name of the inspector, the location of the filtering system containing the filter (if more than one spray booth), and the date that the filter was inspected.
3) The Permittee shall maintain on file and make available to the Control Officer upon request, a copy of the manufacturer's specifications verifying that the average overspray removal efficiency for the filter is at least ninety-two percent (92%).
4) The Permittee shall inspect the facility weekly for evidence of any spraying activity that occurred outside of any enclosure required by these Permit

Conditions. The Permittee shall record the results of the inspection, including the name of the person conducting the inspection and the date of the inspection.

D. Monitoring and Recordkeeping Requirements for Coating Wood Furniture and Fixtures

1) The Permittee shall keep the following records and lists in a consistent and complete manner and shall make them available to the Control Officer without delay during normal business hours. Each record shall be maintained for a minimum of five years.

a) Current List of VOC Containing Material
The Permittee shall maintain a current list of all VOC-containing material which contains the name or code of each material and its VOC content, expressed in accordance with County Rule 342 §§501.1b and 501.1c. Any qualified single resin-layer finish shall be identified as such.

b) Current List of Mix Ratios
The Permittee shall maintain a current list of the manufacturer's recommended mix ratio of components, including but not limited to addition of reducers and catalysts/hardeners, except when the manufacturer has no recommendations for any additions.

[County Rule 342 §501][SIP Rule 342 §501]

2) The Permittee shall maintain daily records indicating the amount and VOC content of each day's use of each topcoat, sealer, or booth material that exceeds applicable VOC limits contained in County Rule 342 §§301 or 304 and the conditions of this Permit based upon those requirements. The records shall be logged and totaled by the end of the following workday. VOC content shall be entered for each such material.

[County Rule 342 §501.2a][SIP Rule 342 §501.2a]

3) The Permittee shall maintain the following monthly records for material compliant with County Rule 342 §§301 and 304, and the conditions of this Permit based upon those requirements, and shall update such records prior to the conclusion of the following month:

a) For each topcoat and sealer to which reducer is added at any time after its arrival at a facility, enter the VOC content in lb VOC/lb Solids or in grams/liter (lb/gal) less water and non-precursor organic compounds.

b) The amount of coating, the amount of catalyst/hardener, and the amount of reducer/coating diluent used.

c) The quantity and type of organic solvent used each month for stripping and cleaning.

d) The quantity of organic solvent disposed of offsite during the month just ended.

e) Exception: The Permittee shall update yearly the totals of usage of each VOC-containing material known to be used in quantities less than 15 gallons (or 57 liters) per year.

[County Rule 342 §501.2b][SIP Rule 342 §501.2b]

The Permittee shall not be required to maintain records of the VOC content of any mixture of any coatings regulated by County Rule 342 as long as no individual coating in the mixture exceeds the VOC limits for coatings in Table 342-1. If any diluent, as defined in County Rule 342 §211, is mixed with a coating regulated by Table 342-1, and the diluent has a VOC content in excess of

the maximum VOC content of the coating allowed by Table 342-1, records of the mixture shall be kept according to County Rule 342 §501.2b.

[County Rule 210 §302.1c]

4) The Permittee shall keep records on the use of conventional air-atomized spray equipment and other restricted-use guns associated with County Rule 342 §302 and the conditions of this Permit based on those requirements. The records shall be kept according to the following:
   a) A log shall be kept of the amount of coating exceeding 1 pound of VOC per pound of solid used by each conventional air-atomized or other restricted use gun. This log shall be updated daily or each time coating is added to the gun's coating reservoir.
   [County Rule 342 §307.2e(3)][SIP Rule 342 §307.2e(3)]
   b) Records shall show for each semi-annual period the total volume (VR) of coatings used during that semi-annual period exceeding 1.0 pound of VOC per pound of solids (or 1.0 kilogram of VOC per kilogram of solids) applied with conventional air-atomized spray equipment and other restricted-use guns.
   [County Rule 342 §501.2c][SIP Rule 342 §501.2c]
   c) Records shall show for each semi-annual period the total volume of all finishing materials (AMV) used throughout the facility.
   [County Rule 342 §501.2c][SIP Rule 342 §501.2c]
   d) The total volume (VR) so applied over the previous six months shall be divided by the total of all coatings used in the same period (AMV) and these calculations and the result shall be entered in the log.
   [County Rule 342 §501.2c][SIP Rule 342 §501.2c]

5) The Permittee shall maintain records of disposal/recovery of all VOC containing materials.

[County Rule 342 §501.3][SIP Rule 342 §501.3]

21. REPORTING REQUIREMENTS

**NOTE: Additional reporting requirements are found in the general conditions of this permit, and in each section of the Specific Conditions for Potential Support Activities.*

A. Semi-Annual Monitoring Report

The Permittee shall file semiannual monitoring reports with the Control Officer, Attn: Large Source Compliance Supervisor. The initial reporting period shall begin on the permit issuance date and shall cover a period of 6 months or less. The second and subsequent reporting periods shall be in 6 month intervals after the end of the initial reporting period. The semiannual monitoring reports shall be filed by the end of the month following the reporting period. Each report shall cover all instances of deviations from these permit conditions during the reporting period, the cause of the deviations if any were present, and any applicable corrective actions taken. The monitoring report shall also contain the following information at a minimum:

[County Rule 210 §302.1 e (1)]

1) Emissions Calculations [County Rule 210 §302.1e]
The Permittee shall include the results of the monthly and the rolling 12-month emissions calculations for each month in the six-month reporting period.

2) Deviation Reporting [County Rule 210 §302.1e(1)]

The Permittee shall identify all instances of deviations from permit requirements in the semi-annual monitoring report. The Permittee shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.

3) Visible Emissions [County Rule 210 §302.1e][County Rule 311]

If visible emissions were observed during the reporting period:

(1) Dates on which visible emissions were observations were taken;
(2) Name of the observer;
(3) Whether or not visible emissions were present;
(4) The opacity of visible emissions determined by a Method 9 opacity reading, if applicable;
(5) A description of any corrective actions taken, including the date such action was taken;
(6) The name of individual certified as a visible emissions evaluator, the date of last certification, and company/agency providing the certification; and
(7) Any other related information.

4) Spray Coating [County Rule 210 §302.1e][County Rule 315]

For the purposes of the semi-annual compliance certification, the Permittee shall provide the following information:

a) If the Permittee operates all spray coating equipment outside of a building and inside an enclosure without fixed air exhaust, the Permittee shall provide a statement certifying the following:
   1) That the enclosure has at least three sides that are a minimum of eight feet in height;
   2) That no spraying was conducted within three feet of any open end, or within two feet of any open top of the enclosure; and
   3) That the spray is directed in a horizontal or downward pointing manner for three-sided enclosures, or away from any opening for complete enclosures and three-sided enclosures with roofs.

b) If the Permittee operates all spray coating equipment with a filtering system on a spray booth or enclosure with forced air exhaust, the Permittee shall provide a statement certifying the following:
   1) That each filter installed on a spray booth or enclosure was inspected for gaps, sags or holes once every two weeks;
   2) That all filters that were observed to have gaps, sags or holes were immediately replaced; and
   3) Details of the make and manufacturer of each filter used as well as its overspray control efficiency.

c) The Permittee shall provide a statement certifying that no spraying occurred outside of the paint booths. If evidence of spraying outside of the booth was found, the Permittee shall instead submit a statement detailing any corrective action taken in order to ensure that future spraying occurs inside the spray booth.

[County Rule 201 §302.1e] [locally enforceable only]

5) Coating Wood Furniture and Fixtures

[County Rule 210 §302.1e][County Rule 342]

a) A list of coatings regulated by County Rule 342 that were used at the facility during the six month period, along with the VOC content of each coating.

b) If any conventional air-atomized or other restricted use guns were used during the six month period, a description of the exemption that applies to the use of such guns and justification for the exemption.

6) Odor Log

The Permittee shall include a copy of the portion of the odor log which covers the applicable 6 month reporting period in each of the semiannual compliance reports. If no complaints were received during the reporting period, a statement to that effect may be substituted for the copy of the odor log.

[County Rule 210 §302.1.e.(1)] [locally enforceable only]

22. COMPLIANCE PLAN

A. In the event that the cyclone does not demonstrate compliance with either the operational requirement of 90% removal efficiency or the particulate matter allowable emission rate as defined by the process weight rate equation specified in County Rule 311, the Permittee shall install a different control technology replacing the cyclone to ensure compliance with County Rule 311 in accordance with the following compliance schedule.

Milestones	Completion Date
Prepare and submit permit revision application for control technology.	09-01-2005
Control technology delivery.	12-01-2005
Installation of control technology	01-15-2006
Start-up and debugging period.	03-15-2006
Submit Test Protocol to Maricopa County in accordance with County Rule 270	04-01-2006
Conduct Performance Test in accordance with EPA Test Method 5.	05-15-2006
Submit Test Report to Maricopa County	06-15-2006

B. The Permittee shall submit a certified progress report to the Control Officer monthly to the Attn: Large Source Compliance Supervisor. The report shall contain, at a minimum, the following information:

1) Dates when the milestones specified in paragraph A of this permit condition were achieved; and

2) An explanation of why any dates in the schedule of compliance were not or will not be met, any preventive or corrective measures adopted.

[County Rule 210 §305.1g]

23. SUBPART JJ—NATIONAL EMISSION STANDARDS FOR WOOD FURNITURE MANUFACTURING OPERATIONS

[40 CFR 63 Subpart JJ][County Rule 370 §302.26]

A. Allowable Emissions

1) The Permittee shall limit VHAP emissions from finishing operations by achieving a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids) of no greater than 1.0

To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the Permittee shall use the methods presented in **Permit Condition [23. B. 12) b)] and 40 CFR §63.803(1)** for determining styrene and formaldehyde usage.

[40 CFR §63.802(a)(1)][County Rule 370 §302.26]

2) The Permittee shall limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:

a) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied; or

b) For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented above for foam adhesives, but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.

[40 CFR §63.802(a)(2)][County Rule 370 §302.26]

3) The Permittee shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

[40 CFR §63.802(a)(3)][County Rule 370 §302.26]

B. Work Practice Standards

1) Work practice implementation plan

The Permittee shall maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs 2) through 12) of this section, **[Permit Condition 23.B.]**. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Control Officer or the Administrator upon request. If the Control Officer or the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs 2) through 12) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

[40 CFR §63.803(a)][County Rule 370 §302.26]

2) Operator Training Course

The Permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

a) A list of all current personnel by name and job description that are required to be trained;
b) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
c) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
d) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

[40 CFR §63.803(b)][County Rule 370 §302.26]

3) Inspection and Maintenance Plan

The Permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

a) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
b) An inspection schedule;
c) Methods for documenting the date and results of each inspection and any repairs that were made;
d) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
    (1) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
    (2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

[40 CFR §63.803(c)][County Rule 370 §302.26]

4) Cleaning and washoff solvent accounting system

The Permittee shall develop an organic solvent accounting form to record:

a) The quantity and type of organic solvent used each month for washoff and cleaning, as defined in the 40 CFR §63.801;
b) The number of pieces washed off, and the reason for the washoff; and

d) The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

[40 CFR §63.803(d)][County Rule 370 §302.26]

5) Chemical composition of cleaning and washoff solvents
The Permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 23.2 to this section, in concentrations subject to MSDS reporting as required by OSHA.

[40 CFR §63.803(e)][County Rule 370 §302.26]

6) Spray booth cleaning
The Permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.

[40 CFR §63.803(f)][County Rule 370 §302.26]

7) Storage requirements
The Permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

[40 CFR §63.803(g)][County Rule 370 §302.26]

8) Application equipment requirement
The Permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
a) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
b) For touchup and repair under the following conditions:
(1) The touchup and repair occurs after completion of the finishing operation; or
(2) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
c) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
d) When emissions from the finishing application station are directed to a control device;
e) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
f) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical

report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

(1) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(2) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

[40 CFR §63.803(h)][County Rule 370 §302.26]

9) Line cleaning

The Permittee shall pump or drain all organic solvent used for line cleaning into a normally closed container.

[40 CFR §63.803(i)][County Rule 370 §302.26]

10) Gun cleaning

The Permittee shall collect all organic solvent used to clean spray guns into a normally closed container.

[40 CFR §63.803(j)][County Rule 370 §302.26]

11) Washoff operation.

The Permittee shall control emissions from washoff operations by:

a) Using normally closed tanks for washoff; and

b) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

[40 CFR §63.803(g)][County Rule 370 §302.26]

12) Formulation assessment plan for finishing operations:

The Permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

a) Identifies VHAP from the list presented in Table 23.1 of this section that are being used in finishing operations by the affected source;

b) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph 12) a) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph 12) a) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16.

c) Tracks the annual usage of each VHAP identified in 12) a) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

d) If the annual usage of the VHAP identified in paragraph 12) a) exceeds its baseline level, then the Permittee shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the Permittee from further action, unless the

affected source is not in compliance with any State regulations or requirements for that VHAP:

(1) The exceedance is no more than 15.0 percent above the baseline level;

(2) Usage of the VHAP is below the de minimis level presented in Table 23.1 of this section for that VHAP;

(3) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

(5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

(6) If the Permittee uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 23.3. If usage of the VHAP of potential concern exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in **Permit Conditions [23. B. 12) d)]**, (1) through (4), the affected source shall follow the procedures established in **Permit Condition [23. B. 12) d) (5)]**.

[40 CFR §63.803(l)][County Rule 370 §302.26]

TABLE 23.1 List of VHAP of Potential Concern Identified by Industry

CAS No.	CHEMICAL NAME	EPA deminimus, (tons/year)
68122	Dimethyl formamide	1.0
50000	Formaldehyde	0.2
75092	Methyl chloride	4.0

79469	2-Nitropropane	1.0
78591	Isophorone	0.7
1000425	Styrene monomer	1.0
108952	Phenol	0.1
111422	Dimethanolamine	5.0
109864	2-Methoxyethanol	10.0
111159	2-Ethoxyethyl acetate	10.0

40 CFR Subpart JJ, TABLE 5

C. Compliance Procedures and Monitoring Requirements

1) The Permittee calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E that is no greater than 1.0;

[40 CFR §63.804(a)(l)][County Rule 370 §302.26]

Equation 1

$$E=(Mc1Cc1 + Mc2Cc2 + * * * * + McnCcn + S1W1 + S2W2 + * * * SnWn)/(Mc1 + Mc2 + * * * * + Mcn)$$

2) Definitions:

Cc = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).

E = the emission limit achieved by an emission point or a set of emission points, in kg VHAP/kg solids
(lb VHAP/ lb solids).

Mc = the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).

S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.

W = the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.

[40 CFR §63.801(a)][County Rule 370 §302.26]

3) The Permittee shall use compliant foam adhesives with a VHAP content no greater than 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied.

[40 CFR §63.804(b)][County Rule 370 §302.26]

4) The Permittee use compliant contact adhesives with a VHAP content no greater than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.

[40 CFR §63.804(c)(1)][County Rule 370 §302.26]

5) Initial compliance

a) The Permittee shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by **Permit Condition [23. F. 2)]**.

The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.

[40 CFR §63.804(f)(1)][County Rule 370 §302.26]

b) The Permittee shall submit an initial compliance status report, as required by **Permit Condition [23. F. 2)]**, stating that compliant contact adhesives are being used by the source.

[40 CFR §63.804(f)(5)][County Rule 370 §302.26]

c) The Permittee shall submit an initial compliance status report, as required by **Permit Condition [23. F. 2)]**, stating that compliant strippable spray booth coatings are being used by the affected source.

[40 CFR §63.804(f)(7)][County Rule 370 §302.26]

d) The Permittee shall submit an initial compliance status report, as required by **Permit Condition [23. F. 2)]**, stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

[40 CFR §63.804(f)(8)][County Rule 370 §302.26]

6) Continuous Compliance Demonstrations

a) The Permittee shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by **Permit Condition [23. F. 3)]**.

(1) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0. The Permittee is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

(2) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[40 CFR §63.804(g)(1)][County Rule 370 §302.26]

b) The Permittee shall submit a compliance certification with the semiannual report required by **Permit Condition [23. F. 3)].**

(1) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day non-compliant contact and/or foam adhesives were used. Each day a non-compliant contact or foam adhesive is used is a single violation of the standard.

(2) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[40 CFR §63.804(g)(5)][County Rule 370 §302.26]

c) The Permittee shall submit a compliance certification with the semiannual report required by **Permit Condition [23. F. 3)]**.
   (1) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day non-compliant materials were used. Each day a non-compliant strippable booth coating is used is a single violation of the standard.
   (2) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[40 CFR §63.804(g)(7)][County Rule 370 §302.26]

d) The Permittee shall submit a compliance certification with the semiannual report required by **Permit Condition [23. F. 3)]**.
   (1) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
   (2) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[40 CFR §63.804(g)(8)][County Rule 370 §302.26]

D. Performance Test Methods

The EPA Method 311 of Appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in ''Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A,'' EPA–340/1–91–010. (Docket No. A–93–10, Item No. IV–A–1).

[40 CFR §63.805(a)][County Rule 370 §302.26]

E. Recordkeeping Requirements

1) The Permittee shall fulfill all recordkeeping requirements of 40 CFR §63.10 of Subpart A, according to the applicability criteria in 40 CFR §63.800(d).

[40 CFR §63.806(a)][County Rule 370 §302.26]

2) The Permittee shall maintain records of the following:
   a) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating used at the facility; and
   b) The VHAP content, in kg VHAP/ kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive used at the facility; and
   c) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating used at the facility.

   [40 CFR §63.806(b)][County Rule 370 §302.26]

3) The Permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.

   [40 CFR §63.806(c)][County Rule 370 §302.26]

4) The Permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
   a) Records demonstrating that the operator training program required by **Permit Condition [23. B. 2)]** is in place;
   b) Records collected in accordance with the inspection and maintenance plan required by **Permit Condition [23. B. 3)]**;
   c) Records associated with the cleaning solvent accounting system required by **Permit Condition [23. B. 4)]**;
   d) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by **Permit Condition [23. B. 8) e)]**;
   e) Records associated with the formulation assessment plan required by **Permit Condition [23. B. 12)]**; and
   f) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

   [40 CFR §63.806(e)][County Rule 370 §302.26]

5) The Permittee shall maintain records of the compliance certifications submitted in accordance with **Permit Condition [23. F. 3)]** for each semiannual period following the compliance date.

   [40 CFR §63.806(h)][County Rule 370 §302.26]

6) The Permittee shall maintain records of all other information submitted with the compliance status report required by 40 CFR §63.9(h) and **Permit Condition [23. F. 2)] and Permit Condition [23. F. 3)]**.

   [40 CFR §63.806(i)][County Rule 370 §302.26]

7) The Permittee shall maintain all records in accordance with the requirements of 40 CFR §63.10(b)(1).

   [40 CFR §63.806(j)][County Rule 370 §302.26]

F. Reporting requirements

1) The Permittee shall fulfill all reporting requirements of 40 CFR § 63.7 through § 63.10 of subpart A (General Provisions) according to the applicability criteria in the 40 CFR §63.800(d).

[40 CFR §63.807(a)][County Rule 370 §302.26]

2) The Permittee shall submit the compliance status report required by § 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by **Permit Condition [23. C. 5)]**.

[40 CFR §63.807(b)][County Rule 370 §302.26]

3) The Permittee demonstrating compliance in accordance with **Permit Condition [23. C. 6)]** shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

a) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.

b) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

c) The semiannual reports shall include the information required by **Permit Condition [23. C. 6)]**, a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

d) The frequency of the reports required by paragraph 3) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

e) The Permittee is required to provide a written notification under **Permit Condition [23. B. 12) (6)]** shall include in the notification one or more statements that explain the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

[40 CFR §63.807(c)][County Rule 370 §302.26]

Table 23.2 Pollutants Excluded From Use in Cleaning and Washoff Solvents:

Chemical name	CAS No.
4-Aminobiphenyl	92671
Styrene oxide	96093
Diethyl sulfate	64675
N-Nitrosomorpholine	59892
Dimethyl formamide	68122
Hexamethylphosphoramide	680319
Acetamide	60355
4,4'-Methylenedianiline	101779
o-Anisidine	90040
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746016

Beryllium salts	
Benzidine	92875
N-Nitroso-N-methylurea	684935
Bis (chloromethyl) ether	542881
Dimethyl carbamoyl chloride	79447
Chromium compounds (hexavalent)	
1,2-Propylenimine (2-Methyl aziridine)	75558
Arsenic and inorganic arsenic compounds	99999904
Hydrazine	302012
1,1-Dimethyl hydrazine	57147
Beryllium compounds	7440417
1,2-Dibromo-3-chloropropane	96128
N-Nitrosodimethylamine	62759
Cadmium compounds	
Benzo (a) pyrene	50328
Polychlorinated biphenyls (Aroclors)	1336363
Heptachlor	76448
3,3'-Dimethyl benzidine	119937
Nickel subsulfide	12035722
Acrylamide	79061
Hexachlorobenzene	118741
Chlordane	57749
1,3-Propane sultone	1120714
1,3-Butadiene	106990
Nickel refinery dust	
2-Acetylaminoflourine	53963
3,3'-Dichlorobenzidine	53963
Lindane (hexachlorcyclohexane, gamma)	58899
2,4-Toluene diamine	95807
Dichloroethyl ether (Bis(2-chloroethyl) ether)	111444
1,2-Diphenylhydrazine	122667
Toxaphene (chlorinated camphene)	8001352
2,4-Dinitrotoluene	121142
3,3'-Dimethoxybenzidine	119904
Formaldehyde	50000
4,4'-Methylene bis (2-chloroaniline)	101144
Acrylonitrile	107131
Ethylene dibromide (1,2-Dibromoethane)	106934
DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	72559

Chlorobenzilate	510156
Dichlorvos	62737
Vinyl chloride	75014
Coke Oven Emissions	
Ethylene oxide	75218
Ethylene thiourea	96457
Vinyl bromide (bromoethene)	593602
Selenium sulfide (mono and di)	7488564
Chloroform	67663
Pentachlorophenol	87865
Ethyl carbamate (Urethane)	51796
Ethylene dichloride (1,2-Dichloroethane)	107062
Propylene dichloride (1,2-Dichloropropane)	78875
Carbon tetrachloride	56235
Benzene	71432
Methyl hydrazine	60344
Ethyl acrylate	140885
Propylene oxide	75569
Aniline	62533
1,4-Dichlorobenzene(p)	106467
2,4,6-Trichlorophenol	88062
Bis (2-ethylhexyl) phthalate (DEHP)	117817
o-Toluidine	95534
Propoxur	114261
1,4-Dioxane (1,4-Diethyleneoxide)	123911
Acetaldehyde	75070
Bromoform	75252
Captan	133062
Epichlorohydrin	106898
Methylene chloride (Dichloromethane)	75092
Dibenz (ah) anthracene	53703
Chrysene	218019
Dimethyl aminoazobenzene	60117
Benzo (a) anthracene	56553
Benzo (b) fluoranthene	205992
Antimony trioxide	1309644
2-Nitropropane	79469
1,3-Dichloropropene	542756
7, 12-Dimethylbenz(a) anthracene	57976
Benz(c) acridine	225514

Indeno(1,2,3-cd)pyrene	193395
1,2:7,8-Dibenzopyrene	189559

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Table 23.3 VHAP OF POTENTIAL CONCERN

CAS Number	Chemical Name	EPA, deminimus (tons per year)
92671	4-Aminobiphenyl	1.0
96093	Styrene oxide	1.0
64675	Diethyl sulfate	1.0
59892	N-Nitrosomorpholine	1.0
68122	Dimethyl formamide	1.0
680319	Hexamethylphosphoramide	0.01
60355	Acetamide	1.0
101779	4,4'-Methylenedianiline	1.0
90040	o-Anisidine	1.0
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin	0.00000006
92875	Benzidine	0.00003
684935	N-Nitroso-N-methylurea	0.00002
542881	Bis (chloromethyl) ether	0.00003
79447	Dimethyl carbamoyl chloride	0.002
75558	1,2-Propylenimine (2-Methyl aziridine)	0.0003
57147	1,1-Dimethyl hydrazine	0.0008
96128	1,2-Dibromo-3-chloropropane	0.001
62759	N-Nitrosodimethylamine	0.001
50328	Benzo (a) pyrene	0.001
1336363	Polychlorinated biphenyls (Aroclors)	0.0009
76448	Heptachlor	0.002
119937	3,3'-Dimethyl benzidine	0.001
79061	Acrylamide	0.002
118741	Hexachlorobenzene	0.004
57749	Chlordane	0.005
1120714	1,3-Propane sultone	0.003
106990	1,3-Butadiene	0.007
53963	2-Acetylaminoflourine	0.0005
53963	3,3'-Dichlorobenzidine	0.02
58899	Lindane (hexachlorcyclohexane, gamma)	0.005
95807	2,4-Toluene diamine	0.002
111444	Dichloroethyl ether (Bis(2-chloroethyl) ether)	0.006
122667	1,2-Diphenylhydrazine	0.009
8001352	Toxaphene (chlorinated camphene)	0.006
121142	2,4-Dinitrotoluene	0.002
119904	3,3'-Dimethoxybenzidine	0.01
50000	Formaldehyde	0.2
101144	4,4'-Methylene bis (2-chloroaniline)	0.02

107131	Acrylonitrile	0.03
106934	Ethylene dibromide (1,2-Dibromoethane)	0.01
72559	DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	0.01
510156	Chlorobenzilate	0.04
62737	Dichlorvos	0.02
75014	Vinyl chloride	0.02
75218	Ethylene oxide	0.09
96457	Ethylene thiourea	0.06
593602	Vinyl bromide (bromoethene)	0.06
67663	Chloroform	0.09
87865	Pentachlorophenol	0.07
51796	Ethyl carbamate (Urethane)	0.08
107062	Ethylene dichloride (1,2-Dichloroethane)	0.08
78875	Propylene dichloride (1,2-Dichloropropane)	0.1
56235	Carbon tetrachloride	0.1
71432	Benzene	0.2
140885	Ethyl acrylate	0.1
75569	Propylene oxide	0.5
62533	Aniline	0.1
106467	1,4-Dichlorobenzene(p)	0.3
88062	2,4,6-Trichlorophenol	0.6
117817	Bis (2-ethylhexyl) phthalate (DEHP)	0.5
95534	o-Toluidine	0.4
114261	Propoxur	2.0
79016	Trichloroethylene	1.0
123911	1,4-Dioxane (1,4-Diethyleneoxide)	0.6
75070	Acetaldehyde	0.9
75252	Bromoform	2.0
133062	Captan	2.0
106898	Epichlorohydrin	2.0
75092	Methylene chloride (Dichloromethane)	4.0
127184	Tetrachloroethylene (Perchloroethylene)	4.0
53703	Dibenz (ah) anthracene	0.01
218019	Chrysene	0.01
60117	Dimethyl aminoazobenzene	1.0
56553	Benzo (a) anthracene	0.01
205992	Benzo (b) fluoranthene	0.01
79469	2-Nitropropane	1.0
542756	1,3-Dichloropropene	1.0
57976	7,12-Dimethylbenz (a) anthracene	0.01
225514	Benz(c)acridine	0.01
193395	Indeno(1,2,3-cd)pyrene	0.01
189559	1,2:7,8-Dibenzopyrene	0.01
79345	1,1,2,2-Tetrachloroethane	0.03
91225	Quinoline	0.0006

75354	Vinylidene chloride (1,1-Dichloroethylene)	0.04
87683	Hexachlorobutadiene	0.09
82688	Pentachloronitrobenzene (Quintobenzene)	0.03
78591	Isophorone	0.7
79005	1,1,2-Trichloroethane	0.1
74873	Methyl chloride (Chloromethane)	1.0
67721	Hexachloroethane	0.5
1582098	Trifluralin	0.9
1319773	Cresols/Cresylic acid (isomers and mixture)	1.0
108394	m-Cresol	1.0
75343	Ethylidene dichloride (1,1-Dichloroethane)	1.0
95487	o-Cresol	1.0
106445	p-Cresol	1.0
74884	Methyl iodide (Iodomethane)	1.0
100425	Styrene	1.0
107051	Allyl chloride	1.0
334883	Diazomethane	1.0
95954	2,4,5--Trichlorophenol	1.0
133904	Chloramben	1.0
106887	1,2--Epoxybutane	1.0
108054	Vinyl acetate	1.0
126998	Chloroprene	1.0
123319	Hydroquinone	1.0
92933	4-Nitrobiphenyl	1.0
56382	Parathion	0.1
13463393	Nickel Carbonyl	0.1
60344	Methyl hydrazine	0.006
151564	Ethylene imine	0.0003
77781	Dimethyl sulfate	0.1
107302	Chloromethyl methyl ether	0.1
57578	beta-Propiolactone	0.1
100447	Benzyl chloride	0.04
98077	Benzotrichloride	0.0006
107028	Acrolein	0.04
584849	2,4--Toluene diisocyanate	0.1
75741	Tetramethyl lead	0.01
78002	Tetraethyl lead	0.01
12108133	Methylcyclopentadienyl manganese	0.1
624839	Methyl isocyanate	0.1
77474	Hexachlorocyclopentadiene	0.1
62207765	Fluomine	0.1
10210681	Cobalt carbonyl	0.1
79118	Chloroacetic acid	0.1
534521	4,6-Dinitro-o-cresol, and salts	0.1
101688	Methylene diphenyl diisocyanate	0.1

108952	Phenol	0.1
62384	Mercury, (acetato-o) phenyl	0.01
98862	Acetophenone	1.0
108316	Maleic anhydride	1.0
532274	2-Chloroacetophenone	0.06
51285	2,4-Dinitrophenol	1.0
109864	2-Methyoxy ethanol	10.0
98953	Nitrobenzene	1.0
74839	Methyl bromide (Bromomethane)	10.0
75150	Carbon disulfide	1.0
121697	N,N-Dimethylaniline	1.0
106514	Quinone	5.0
123386	Propionaldehyde	5.0
120809	Catechol	5.0
85449	Phthalic anhydride	5.0
463581	Carbonyl sulfide	5.0
132649	Dibenzofurans	5.0
100027	4-Nitrophenol	5.0
540841	2,2,4-Trimethylpentane	5.0
111422	Diethanolamine	5.0
822060	Hexamethylene-1,6-diisocyanate	5.0
	Glycol ethers[1]	5.0
	Polycyclic organic matter[2]	0.01

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[1] Except for ethylene glycol butyl ether, ethylene glycol ethyl ether (2- ethoxy ethanol), ethylene glycol hexyl ether, ethylene glycol methyl ether (2-methoxyethanol), ethylene glycol phenyl ether, ethylene glycol propyl ether, ethylene glycol mono-2-ethylhexyl ether, diethylene glycol butyl ether, diethylene glycol ethyl ether, diethylene glycol methyl ether, diethylene glycol hexyl ether, diethylene glycol phenyl ether, diethylene glycol propyl ether, triethylene glycol butyl ether, triethylene glycol ethyl ether, triethylene glycol methyl ether, triethylene glycol propyl ether, ethylene glycol butyl ether acetate, ethylene glycol ethyl ether acetate, and diethylene glycol ethyl ether acetate.

[2] Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah) anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.

SPECIFIC CONDITIONS FOR POTENTIAL SUPPORT ACTIVITIES

24. PERMIT CONDITIONS FOR SOLVENT CLEANING

NOTE: These conditions are intended to regulate VOC-containing solvent. "Cleaning Solvent" is defined in County Rule 311 §206 as "Solvent used for cleaning that contains more than 2.0% VOC by weight and more than 20 grams of VOC per liter (0.17lb/gal)."

A. Operational Limitations and Standards

Unless exempted by County Rule 331 §308, the Permittee shall comply with all of the following requirements:

1) All cold cleaners shall comply with one of the following requirements:

[County Rule 210 §302.1]

a) The Permittee shall use low VOC cleaner. A low VOC cleaner is any solution or homogeneous suspension that, as used, contains less than 50 grams of VOC per liter of material (0.42 lb VOC/ gal), or is at least ninety-five (95%) water by weight or volume as determined by an applicable test method in County Rule 331 §502; OR

[County Rule 331 §§218 and 304.3]

b) The Permittee shall use a sealed system. A sealed system is an airtight or airless cleaning system that is operated according to the manufacturer's specifications and, unless otherwise indicated by the manufacturer, meets all of the following requirements:

(1) Has a door or other pressure-sealing apparatus that is shut during each cleaning and drying cycle.

(2) Has a differential pressure gauge that always indicates the pressure in the sealed chamber when occupied or in active use.

(3) Any associated pressure relief device(s) shall be so designed and operated as to prevent liquid cleaning-solvents from draining out; OR

[County Rule 331 §304.3]

c) The Permittee shall install or operate batch loaded cleaners with a remote reservoir, including the cabinet type(s), equipped with the following:

(1) A sink-like work area or basin that is sloped sufficiently towards the drain so as to prevent pooling of cleaning-solvent.

(2) A single, unimpeded drain opening or cluster of openings served by a single drain for the cleaning-solvent to flow from the sink into the enclosed reservoir. Such opening(s) shall be contained within a contiguous area not larger than 15.5 square inches (100 cm^2).

(3) A means for drainage of cleaned parts such that the drained solvent is returned to the cleaning machine; OR

[County Rule 331 §305][SIP Rule 331 §305]

d) The Permittee shall install or operate batch-loaded cleaners without a remote reservoir (such as a solvent dip-tank), equipped with all of the following:

(1) Have and use an internal drainage rack or other assembly that confines within the freeboard all cleaning-solvent dripping from parts and returns it to the hold of the cleaning machine (degreaser).

(2) Have an impervious cover which when closed prevents cleaning-solvent vapors in the cleaning machine from escaping into the

air/atmosphere when not processing work in the cleaning machine. The cover shall be fitted so that in its closed position the cover is between the cleaning-solvent and any lip exhaust or other safety vent, except that such position of cover and venting may be altered by an operator for valid concerns of flammability established in writing and certified to by a Certified Safety Professional or a Certified Industrial Hygienist to meet health and safety requirements.

(3) The freeboard height shall be not less than 6 inches (15.2 cm). Freeboard height for batch cleaning machines is the vertical distance from the solvent/air interface to the least elevated point of the top-rim when the cover is open or removed, measured during idling mode.

(4) The freeboard zone shall have a permanent, conspicuous mark that locates the maximum allowable solvent level that conforms to the applicable freeboard requirements.

[County Rule 331 §305][SIP Rule 331 §302]

2) Solvent Handling Requirements

a) All cleaning-solvent, including solvent soaked materials, shall be kept in closed leakfree containers that are opened only when adding or removing material.

(1) Rags used for wipe cleaning shall be stored in closed containers when not in use.

(2) Each container shall be clearly labeled with its contents.

[County Rule 331 §301.1][SIP Rule 331 §§301 and 306]

b) If any cleaning-solvent escapes from a container:

(1) Wipe up or otherwise remove immediately if in accessible areas.

(2) For areas where access in not feasible during normal production, remove as soon as reasonably possible.

[County Rule 331 §301.2][locally enforceable only]

c) Unless records show that VOC-containing cleaning material was sent offsite for legal disposal, it will be assumed that it evaporated on site.

[County Rule 331 §301.3][locally enforceable only]

3) Equipment Requirements for All Cleaning Machines

a) The Permittee shall provide a leak-free container (degreaser) for the solvents and the articles being cleaned.

[County Rule 331 §302.1][SIP Rule 331 §301.1]

(1) The VOC-containment portion shall be impervious to VOC-containing liquid and vapors.

[County Rule 331 §302.1a][locally enforceable only]

(2) No surface of any freeboard required by these Permit Conditions shall have an opening or duct through which VOC can escape to the atmosphere except as required by OSHA.

[County Rule 331 §302.1b][locally enforceable only]

b) The Permittee shall properly maintain and operate all cleaning machine equipment required by these Permit Conditions and any of its emission controls required by these Permit Conditions.

[County Rule 331 §302.2][SIP Rule 331§ 306.1]

c) The Permittee shall not dispose of any solvent, including waste solvent, in such a manner as will cause or allow its evaporation into the atmosphere. Records of its disposal/recovery shall be kept in accordance with hazardous waste disposal statutes.

[SIP Rule 331 §306.4]

4) Specific Operating & Signage Requirements For Cleaning Machines

[County Rule 331 §303][SIP Rule 331 §306]

a) The Permittee shall conform to the following operating requirements when cleaning with cleaning-solvents other than Low-VOC Cleaners or when not using a sealed system:
   (1) Comfort fans shall not be used near cleaning machines;
   (2) Do not remove any device designed to cover the solvent unless processing work in the cleaning machine or maintaining the machine;
   (3) Drain cleaned parts for at least (15) fifteen seconds after cleaning or until dripping ceases, whichever is later;
   (4) If using a cleaning-solvent spray system:
      (a) Use only a continuous, undivided stream (not a fine, atomized, or shower type spray).
      (b) Pressure at the orifice from which the solvent emerges shall not exceed (10) ten psig and shall not cause liquid solvent to splash outside the solvent container.
      (c) In an in-line cleaning machine, a shower-type spray is allowed, provided that the spraying is conducted in a totally confined space that is separated from the environment.
      (d) Exceptions to the foregoing Subsections (a), (b), and (c) are provided for in County Rule 331 §§307.1, 307.2, and 307.3.
   (5) The Permittee shall not cause agitation of a cleaning-solvent in a cleaning machine by sparging with air or other gas. Covers shall be placed over ultrasonic cleaners when the cleaning cycle exceeds (15) fifteen seconds;
   (6) The Permittee shall not place porous or absorbent materials in or on a cleaning machine. This includes, but is not limited to, cloth, leather, wood, and rope. No object with a sealed wood handle, including a brush, is allowed;
   (7) The ventilation rate at the cleaning machine shall not exceed 65 cfm per square foot of evaporative surface (20 $m^3/min/m^2$), unless that rate must be changed to meet a standard specified and certified by a Certified Safety Professional, a Certified Industrial Hygienist, or a licensed professional engineer experienced in ventilation, to meet health and safety requirements;
   (8) Limit the vertical speed of mechanical hoists moving parts in and out of the cleaning machine to a maximum of 2.2 inches per second and (11) eleven ft/ min (3.3 m/min);
   (9) The Permittee shall prevent cross contamination of solvents regulated by County Rule 331§304 of this Section with solvents that are not so regulated. Use signs, separated work-areas, or other effective means for this purpose. This includes those spray gun

cleaning solvents that are regulated by another Section of this Permit.

b) Should the Permittee use a cleaning-solvent other than Low-VOC cleaner, in any solvent machine (degreaser) or dip tank that is not a sealed system, the Permittee shall provide on the machine, or within 3 1/4 feet (1 meter) of the machine, a permanent, conspicuous label, or placard which includes at a minimum, each of the following applicable instructions, or its equivalent:
   (1) "Keep cover closed when parts are not being handled."(This is not required for remote reservoir cleaners.)
   (2) "Drain parts until they can be removed without dripping."
   (3) "Do not blow off parts before they have stopped dripping."
   (4) "Wipe up spills and drips as soon as possible; store used spill rags [or 'wiping material'] in covered container."
   (5) "Don't leave cloth or any absorbent materials in or on this tank."
   (6) For cleaning machines with moving parts such as hoists, pumps, or conveyors, post: "Operating instructions can be obtained from _____" where the Permittee shall list a person or place where the instructions are available.

5) Solvent Specification [County Rule 331 §304][locally enforceable only] All cleaning solvents, except Low-VOC cleaners and those used in a sealed system, shall be conforming solvents. A conforming solvent is one which has a total VOC vapor pressure at 68ºF (20ºC) not exceeding 1 millimeter of mercury column maximum total VOC vapor pressure.

6) Special Non-Vapor Cleaning Situations [County Rule 331 §§307.1, 307.2 and 307.3]
   a) The Permittee shall operate and equip the devices in the following manner when blasting or misting with conforming solvents;
      (1) The device shall have internal drainage, a reservoir or sump, and a completely enclosed cleaning chamber, designed so as to prevent any perceptible liquid from emerging from the device; and
      (2) The device shall be operated such that there is no perceptible leakage from the device except for incidental drops from drained, removed parts.
   b) The Permittee shall use a sealed system for all blasting or misting with a non-conforming solvent.
   c) Cleaning systems using cleaning-solvent that emerges from an object undergoing high pressure flushing with a visible mist or at a pressure exceeding 10 psig, shall comply as follows;
      (1) For conforming solvents, use a containment system that is designed to prevent any perceptible cleaning-solvent liquid from becoming airborne outside the containment system, such as a completely enclosed chamber.
      (2) Use a sealed system for non-conforming solvents.
   d) Low-VOC cleaners are not subject to the foregoing special non-vapor cleaning requirements a), b) and c).

B. Monitoring and Recordkeeping Requirements

[County Rule 331 §501][SIP Rule 331 §501]

1) The Permittee shall maintain a current list of cleaning-solvents, and shall state the VOC-content of each in pounds VOC per gallon of material or grams per liter of material.
2) Should the Permittee use any cleaning-solvent subject to the vapor-pressure limits of County Rule 331 §304.1 and Permit Conditions based on those limits, the Permittee shall have on site the written value of the total VOC vapor-pressure of each such solvent in one of the following forms:
   a) A manufacturer's technical data sheet,
   b) A manufacturer's safety data sheet (MSDS), or
   c) Actual test results.
3) By the end of each calendar month, the Permittee shall record the amount of cleaning-solvent used during the previous month, as well as show the type and amount of each make-up and all other cleaning-solvent.
4) At least annually, the Permittee shall update usage records of concentrate that is used only in the formulation of Low VOC Cleaner.
5) For the purposes of recording usage, the Permittee may give cleaning-solvents of similar VOC content a single group-name distinct from any product names in the group. The total usage of all the products in that group are then recorded under just one name. (In such a case, the operator must also keep a separate list that identifies the product names of the particular solvents included under the group name.) To the group name shall be assigned the highest VOC content among the members of that group, rounded to the nearest 10^{th} of a pound of VOC per gallon of material, or to the nearest gram VOC per liter of material.

C. Reporting Requirements [County Rule 210 §302.1e(1)]

1) The Permittee shall include the following information in each semi-annual monitoring report;
   a) A summary of the listed cleaning-solvents currently used at the facility with the VOC-content of each cleaning solvent stated in VOC per gallon of material or grams per liter of material;
   b) A summary of any testing that may have been performed during the period

25. PERMIT CONDITIONS FOR DUST GENERATING ACTIVITIES

A. Dust Control Plan Required

1) The Permittee shall submit a Dust Control Plan and obtain the Control Officer's approval of the Dust Control Plan, before commencing any routine dust generating operation. The Dust Control Plan shall describe all control measures to be implemented before, after and while conducting any dust generating operation, including during weekends, after work hours, and on holidays. The Plan shall include at least all the information contained in County Rule 310 §304. At least one primary control measure and one contingency control measure must be identified from Table 1 of County Rule 310.

[County Rule 310 §§303, 303.2, 303.3(b) and 303.4(a)]
[County SIP Rule 310 §§303, 303.2, 303.3(b) and 303.4(a)]

2) Failure to comply with the provisions of an approved Dust Control Plan is deemed to be a violation of this Permit. Regardless of whether an approved Dust

Control Plan is in place or not, the Permittee is still subject to all requirements of these permit conditions at all times. In addition, the Permittee with an approved Dust Control Plan is still subject to all of the requirements of County Rule 310, even if the Permittee is complying with the approved Dust Control Plan.

[County Rule 310 §§303.1 and 306] [County SIP Rule 310 §§303.1and 306]

3) If the Control Officer determines that an approved Dust Control Plan has been followed, yet fugitive dust emissions from any given fugitive dust source still exceed limits from this permit condition, then the Permittee shall make written revisions to the Dust Control Plan and shall submit such revised Dust Control Plan to the Control Officer within three working days of receipt of the Control Officer's written notice, unless such time period is extended by the Control Officer, upon request, for good cause. During the time that the Permittee is preparing revisions to the approved Dust Control Plan, the Permittee must still comply with all requirements of these permit conditions.

[County Rule 310 §305] [County SIP Rule 310 §305]

4) If any changes to a Dust Control Plan, associated with a Title V Permit, are necessary as a result of the most recent revisions of County Rule 310, then the Permittee shall submit a revised Dust Control Plan to the Control Officer, according to the minor permit revision procedures describe in County Rule 210, no later than 6 months after the effective date of the most recent revisions to County Rule 310.

[County Rule 310 §402.2] [County SIP Rule 310 §402.2]

B. Allowable Emissions

The Permittee shall not allow visible fugitive dust emissions to exceed twenty percent (20%) opacity. Exceedances of the opacity limit that occur due to a wind event shall constitute a violation of the opacity limit. However, it shall be an affirmative defense in an enforcement action if the Permittee demonstrates all of the following conditions:

1) All control measures required were followed and one or more of the control measures listed below were applied and maintained;
   a) Cease dust generating operations for the duration of the condition/situation/event when the 60-minute average wind speed is greater than 25 miles per hour. If dust generating operations are ceased for the remainder of the work day, stabilization measures must be implemented; or
   b) Apply water or other suitable dust suppressant twice per hour; or
   c) Apply water as necessary to maintain a soil moisture content at a minimum of twelve percent (12%) as determined by ASTM Method D2216-98 or other equivalent as approved by the Control Officer and the Administer of EPA. For areas which have an optimum moisture content for compaction of less than twelve percent (12%) as determined by ASTM Method D1557-91(1998) or other equivalent as approved by the Control Officer and the Administer of EPA, maintain at least seventy percent (70%) of the optimum soil moisture content.

2) The twenty percent (20%) opacity exceedance could not have been prevented by better application, implementation, operation, or maintenance of control measures;
3) The Permittee compiled and retained records, in accordance with Recordkeeping requirements of this permit; and
4) The occurrence of a wind event on the day(s) in question is documented by records. The occurrence of a wind event must be determined by the nearest Maricopa County Environmental Services Department Air Quality Division monitoring station, from any other certified meteorological station, or by a wind instrument that is calibrated according to manufacturer's standards and that is located at the site being checked.

[County Rule 310 §301 and Table 2][SIP Rule 310 §301 and Table 2]

C. Operational Limitations and Standards

1) Unpaved Parking Lot
   a) The Permittee shall not allow visible dust emissions from any unpaved parking lot to exceed twenty percent (20%)opacity, and either:
      (1) Shall not allow silt loading equal to or greater than 0.33 oz ft^2; or
      (2) Shall not allow the silt content to exceed eight percent (8%).

[County Rule 310 §302.1][SIP Rule 310 §302.1]

2) Unpaved Haul/Access Road
   a) The Permittee shall not allow visible dust emissions to exceed twenty percent (20%) opacity from unpaved access roads and:
      (1) Shall not allow silt loading equal to or greater than 0.33 oz/ft^2; or
      (2) Shall not allow the silt content to exceed six percent (6%); or
   b) As an alternative to meeting the stabilization requirements for an unpaved haul/access road, limit vehicle trips to no more than 20 per day and limit vehicle speeds to no more than 15 miles per hour. If complying with this Subsection, the Permittee must include, in a Dust Control Plan, the number of vehicles traveled on the unpaved haul/ access road (i.e., number of employee vehicles, earthmoving equipment, haul trucks, and water trucks).

[County Rule 310 §302.2][SIP Rule 310 §302.2]

3) Open Area and Vacant Lot Or Disturbed Surface Area
   a) The Permittee, on any open area and vacant lot or disturbed surface area on which no activity is occurring shall meet at least one of the standards described below, as applicable. The Permittee shall be considered in violation of this permit if such inactive disturbed surface area is not maintained in a manner that meets at least one of the standards described below, as applicable.
      (1) Maintain a visible crust; or
      (2) Maintain a threshold friction velocity (TFV) for disturbed surface areas corrected for non-erodible elements of 100 cm/second or higher; or
      (3) Maintain a flat vegetative cover (i.e., attached (rooted) vegetation or unattached vegetative debris lying on the surface with a predominant horizontal orientation that is not subject to movement by wind) that is equal to at least fifty percent (50%); or

(4) Maintain a standing vegetative cover (i.e., vegetation that is attached (rooted) with a predominant vertical orientation) that is equal to or greater than thirty percent (30%); or

(5) Maintain a standing vegetative cover (i.e., vegetation that is attached (rooted) with a predominant vertical orientation) that is equal to or greater than ten percent (10%) and where the threshold friction velocity is equal to or greater than 43 cm/second when corrected for non-erodible elements; or

(6) Maintain a percent cover that is equal to or greater than ten percent (10%) for non-erodible elements; or

(7) Comply with a standard of an alternative test method, upon obtaining the written approval from the Control Officer and the Administrator of the Environmental Protection Agency (EPA).

[County Rule 310 §302.3][SIP Rule 310 §302.3]

4) Control Measures:

a) The Permittee shall implement control measures before, after, and while conducting any dust generating operation, including during weekends, after work hours, and on holidays. See subsection 304.3, Table 1 and Table 2 of County Rule 310. For the purpose of these Permit Conditions, any control measure that is implemented must meet the applicable standard(s) described in County Rule310 §§301 and 302, as determined by the corresponding test method(s), as applicable, and must meet other applicable standard(s) set forth in County Rule 310. Failure to comply with the provisions County Rule 308 (Work Practices), as applicable, and/or of an approved Dust Control Plan, is deemed a violation of this Permit.

[County Rule 310 §306][County SIP Rule 310 §306]

b) Should any primary control measures(s) in an approved Dust Control Plan prove ineffective, the Permittee shall immediately implement the contingency control measure, which may obviate the requirement of submitting a revised Dust Control Plan. Any control measure that is implemented must meet the applicable standards described in these permit conditions, as determined by the corresponding test method(s), as applicable, and must meet other applicable standards set forth in County Rule 310.

[County Rule 310 §§303, 303.2, 303.3(b) and 303.4(a)]
[County SIP Rule 310 §§303, 303.2, 303.3(b) and 303.4(a)]

5) Work Practices:

a) Bulk Material Hauling Off-Site Onto Paved Public Roadways

When engaged in bulk material hauling off-site onto paved public roadways, the Permittee shall comply with the following work practices. Such work practices shall be implemented to meet the standards described in County Rule 310 §§ 301 and 302..

(1) Load all haul trucks such that the freeboard is not less than three inches; and

(2) Prevent spillage or loss of bulk material from holes or other openings in the cargo compartment's floor, sides, and / or tailgate(s); and

(3) Cover all haul trucks with a tarp or other suitable closure; and

(4) Before the empty haul truck leaves the site, clean the interior of the cargo compartment or cover the cargo compartment.

[County Rule 310 §308.1][County SIP Rule 308.1]
[County SIP Rule 316(a) and(b)]

b) Open Storage Piles:

(1) During stacking, loading, and unloading operations, apply water, as necessary, to maintain compliance with the twenty percent (20%) opacity limitation for fugitive dust sources.

[County Rule 310 §308.6aCounty SIP Rule 310 §308.6a]

(2) Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material, or with use of spray bars and wetting agents, or other measures to prevent excessive amounts of particulate matter from becoming airborne.

[SIP Rule 31 §A.4.b]

(3) When not conduction stacking, loading, and unloading operations, comply with one of the following work practices:

(a) Cover open storage piles with tarps, plastic, or other material to prevent wind from removing the coverings; or

(b) Apply water to maintain soil moisture content at a minimum of twelve percent (12%), as determined by ASTM Method D2216-98, or other equivalent as approved by the Control Officer and the Administrator of EPA. For areas which have an optimum moisture content for compaction of less than twelve percent (12%), as determined by ASTM Method D1557-91(1998) or other equivalent approved by the Control Officer and the Administrator of EPA, maintain at least seventy percent (70%) of the optimum soil moisture content; or

(c) Meet one of the stabilization requirements described in County Rule 310 §302.3; or

(d) Construct and maintain wind barriers, storage silos, or a three-sided enclosure with walls, whose length is no less than equal to the length of the pile, whose distance from the pile is no more than twice the height of the pile, whose height is equal to the pile height, and whose porosity is no more than fifty percent (50%). If complying with this subsection (d), the Permittee must also implement either Condition (b) or (c) above.

[County Rule 310 §308.6b][County SIP Rule 310 §308.6b]

(4) The Permittee shall not cause, suffer, allow, or prevent organic or inorganic dust-producing material to be stacked, piled, or otherwise stored without taking reasonable precautions such as chemical stabilization, wetting, or covering to prevent excessive amounts of particulate matter from becoming airborne.

[SIP Rule 31 §A.4.a]

D. Monitoring and Recordkeeping Requirements

The Permittee shall keep a daily written log recording the actual application or implementation of the control measures delineated in the approved Dust Control Plan. The log or the records and supporting documentation shall be made available to the Control Officer within 48 hours, excluding weekends, from written or verbal request. If the Control Officer is at the site where requested records are kept, records shall be provided without delay.

[County Rule 310 §502][County SIP Rule 310 §502]

Copies of approved Dust Control Plans, control measures implementation records, and all supporting documentation shall be retained at least five years from the date such records are established.

[County Rule 310 §503][County SIP Rule 310 §503]

E. Testing Requirements

The following test methods shall be used as appropriate.

a) Opacity Observations:

(1) Dust Generating Operations

Opacity observations of a source engaging in dust generating operations shall be conducted in accordance with County Rules Appendix C, Section 3 (Visual Determination Of Opacity Of Emissions From Sources For Time-Averaged Regulations) of County Rule 310, except opacity observations for intermittent sources shall require 12 rather than 24 consecutive readings at 15-second intervals for the averaging time.

[County Rule 310 §501.1a, Appendix C Section 3]
[County SIP Rule 310 §501.1a, Appendix C Section3]

(2) Unpaved Parking Lot and Unpaved Haul/Access Road

Opacity observations of any unpaved parking lot and any Unpaved Haul/ Access Road shall be conducted in accordance with Appendix C, Section 2.1 (Test Methods For Stabilization-for Unpaved Roads and Unpaved Parking Lots) of the County Rules.

[County Rule 310 §§501.1b and c, Appendix C Sections 2 and 3]
[County SIP Rule310 §§501.1b and c, Appendix C Sections 2 and 3]

b) Stabilization Observations**:**

(1) Unpaved Parking Lot and Unpaved Haul/Access Road

Stabilization observations for unpaved parking lots shall be conducted in accordance with Appendix C, Section 2.1 (Test Methods For Stabilization-For Unpaved Roads and Unpaved Parking Lots) of the County Rules. When more than 1 test method is permitted for a determination, an exceedance of the limits established in these Permit Conditions determined by any of the applicable test methods constitutes a violation of this Permit.

[County Rule 310 §§501.2a and b, Appendix C Section 2]
[County SIP Rule 310 §§501.2a and b, Appendix C Section2]

(2) Open Area Or Disturbed Surface Area: Stabilization observations for an open area and vacant lot or any disturbed surface area on which no activity is occurring shall be conducted in accordance with at least one of the techniques described in County Rule 310 subsection 501.2c(1) through c(7), as applicable.

[County Rule 310 §501.2c]
[County SIP Rule 310 §501.2c]

26. PERMIT CONDITIONS FOR ARCHITECTURAL COATING

A. Operational Limitations and Standards

1) The Permittee shall limit the volatile organic compound (VOC) content of architectural coatings as follows:

a) Bituminous Pavement Sealer

[County Rule 335 §301][SIP Rule 335 §301]

The Permittee shall not apply any architectural coating manufactured after July 13, 1988, which is recommended for use as a bituminous pavement sealer unless it is an emulsion type coating.

b) Non-Flat Architectural Coating

[County Rule 335 §303][SIP Rule 335 §303]

The Permittee shall not apply any non-flat architectural coating manufactured after July 13, 1990, which contains more than 2.1 lbs (250 g/l) of volatile organic compounds per gallon of coating, excluding water and any colorant added to tint bases. These limits do not apply to specialty coatings listed below.

c) Flat Architectural Coating [County Rule 335 §304][SIP Rule 335 §304]

The Permittee shall not apply any flat architectural coating manufactured after July 13, 1989, which contains more than 2.1 lbs (250 g/l) of volatile organic compounds per gallon of coating, excluding water and any colorant added to tint bases. These limits do not apply to specialty coatings listed below.

d) Specialty Coatings [County Rule 335 §305][SIP Rule 335 §305]

The Permittee shall not apply any architectural coating manufactured after July 13, 1991 that exceeds the following limits. The limits are expressed in pounds of VOC per gallon of coating as applied, excluding water and any colorant added to tint bases.

COATING	(lb/gal)
Concrete Curing Compounds	2.9
Dry Fog Coating	
Flat	3.5
Non-flat	3.3
Enamel Undercoaters	2.9
General Primers, Sealers and Undercoaters	2.9
Industrial Maintenance Primers and Topcoats	
Alkyds	3.5
Catalyzed Epoxy	3.5
Bituminous Coating Materials	3.5
Inorganic Polymers	3.5
Vinyl Chloride Polymers	3.5
Chlorinated Rubbers	3.5
Acrylic Polymers	3.5
Urethane Polymers	3.5
Silicones	3.5
Unique Vehicles	3.5

Lacquers	5.7
Opaque Stains	2.9
Wood Preservatives	2.9
Quick Dry Enamels	3.3
Roof Coatings	2.5
Semi-transparent Stains	2.9
Semi-transparent and Clear Wood Preservatives	2.9
Opaque Wood Preservatives	2.9
Specialty Flat Products	3.3
Specialty Primers, Sealers & Undercoaters	2.9
Traffic Coatings	
Applied to Public Streets and Highways	2.1
Applied to other Surfaces	2.1
Black Traffic Coatings	2.1
Varnishes	2.9
Waterproof Mastic Coating	2.5
Waterproof Sealers	3.3

e) Exemptions

[County Rule 335 §§306and 307][SIP Rule 335 §§306and 307]

The VOC content requirement of this Section shall not apply to the following:

(1) Architectural coatings supplied in containers having capacities of one quart or less.

(2) Architectural coatings recommended by the manufacturer for use solely as one or more of the following:

(a) Below ground wood preservative coatings.
(b) Bond breakers.
(c) Fire retardant coatings.
(d) Graphic arts coatings (sign paints)
(e) Mastic texture coatings.
(f) Metallic pigmented coatings.
(g) Multi-colored paints.
(h) Quick-dry primers, sealers and undercoaters.
(i) Shellacs.
(j) Swimming pool paints.
(k) Tile-like glaze coatings.

B. Monitoring and Recordkeeping Requirements

[County Rule 210 §302.1c] [County Rule 210 §302.1e]

The Permittee shall keep a material list of all coatings used. The material list shall contain the name of each coating, a short description of the material, the pounds of VOCs per gallon of coating excluding water and colorant added to tint bases, and the amount of each coating used. If the coating is exempt from the volatile organic compounds content requirements, the justification for the determination shall be documented and kept on file.

C. Reporting Requirements [County Rule 210 §302.1e]

The Permittee shall include a statement whether or not architectural coating was performed during the six month reporting period in the semi-annual monitoring report.

[County Rule 210 §302]

APPENDIX A
Equipment List for Woodcase Fine Cabinetry , Inc.
3255 W. Osborn Road
Permit V97-014

Woodcase Fine Cabinetry, Inc
3255 W. Osborn Road
Permit Number V97-014
October 3, 2005

Description	Manufacturer	Model	Horsepower	Vented Control Device
Band Saw	Dayton	4TJ91	1	No
Gang Rip Saw	Orgam	PO220	31.5	Yes
Straight Line Rip Saw	Fukami	RT300	7.5	Yes
14”Upcut Saw	Whirlwind	212L	10	Yes
14”Cutoff Saw	Whirlwind	212	10	Yes
14”Cutoff Saw	Irvington	26A	5	Yes
Upright Panel Saw	Rayco	76.8V	5	Yes
10”Unisaw	Powermatic	66	5	Yes
Band Saw	Wilton	8201	1	No
10”Dado	Rockwell	43-381	3	Yes
10”Unisaw	Rockwell	34-466	3	No
Double Miter Saw	Cimmco	DM160	3	Yes
Dado Machine	Home Made	NA	3	Yes
10”Unisaw	Rockwell	34-466	3	No
14”Upcut Saw	Industrial	C-500L-2	3	Yes
10” Table Saw	Delta	NA	2	No
14”Cutoff Saw	Whirlwind	10060	2	No
Holzma CNC Panel Saw	Holzma	HPL 213100	40.5	Yes
Dado Saw	Rockwell	34-395	3	No
Drop-Saw	Jet	HVBS-463	5	None
Table Saw	Home made	NA	3	Yes
10”Unisaw	Delta	NA	2	Yes
10”Dado	Rockwell	34-450	2	Yes
10”Unisaw	Rockwell	34-450	3	No
Band Saw	Wilton	8201	1	No
10”Unisaw	Rockwell	456	2	Yes
10”Dado	Clausing	3HO	5	No
10”Radial Arm Saw	Delta	NA	5	No
12”Radial Arm Saw	DeWalt	NA	5	No
10” Miter Saw	Milwaukee	6490	5	Yes
10”Unisaw	Delta	36-B12	2	Yes
10”Unisaw	NA	NA	3	Yes
Toe Kick Notcher	CTD	NA	2	Yes
5 Spindle Moulder	Weinig	Unimat 17A	5	No

6 Spindle Moulder	Weinig	U23E	127	Yes
Profiler/Sander	Voorwood	A117	18.3	YES
Knife Grinder	Weinig	R960	2	No
Jointer	Delta	DJ20	1.5	No
24”Planer	Rockwell	22-503	8	
Sander and Shaper	Unique	265	2	Yes
Cope/End Shaper	Unique	320	5	Yes
Rail Shaper	Unique	265	2	Yes
Shaper/Feeder	Rodgers	NA	5	Yes
Raised Panel Door Machine	Unique	250MO	5	Yes
Profile Sander	Unique	320	5	No
Raised Panel Door Machine	Unique	250Sc	5	Yes
Finger Router	NA	NA	5	Yes
SAC Planer	SAC	RS63S	9	Yes
SAC Jointer	SAC	FS305	3.75	Yes
Shaper	Rockwell	NA	3	Yes
Shaper	Rodgers	NA	5	Yes
Panel Router	Home made	NA	1.5	No
Panel Router	HerSaf	1436	1.5	No
Mortise Machine	Pade	T46	3	Yes
Tennon Machine	Pade	MDO	1	No
6”Jointer	Jet	JJ6CSX	.75	Yes
Wide Belt Sander	SCMI	UNORCS	31	Yes
Wide Belt Sander	Costa	KA CCCC 1350	90	Yes
Edge Sander	Rodgers	40	5	Yes
Spindle Sander	Rockwell	NA	1.5	No
Sanding Center	Delts	NA	1.5	No
Drill Press	Powermatic	1140F	1	No
Pocket Boring Machine	Castle Tools	TSM20	.25	Yes
Pocket-Boring Machine	Castle Tools	TSM20	.25	Yes
Boring Machine	Ritter	IPF	1	No
Boring Machine	Ritter	NA	1	No
Door Hinge Machine	Omal	M51N1053	1	No

Door Hinge Machine	Omal	M51N1053	1		No
Door Press	Evans Machinery	206	1		No
Edge Bander	Holz Her	1437SE	5.25		Yes
Edge Bander	Holz Her	1408	5		No
Clamp Carrier	Taylor	12 Section	1		No
(7) Paint Spray Booths	NA	NA	18000 cfm each	NA	
Cyclone	NA	NA	3700 cfm	NA	
Baghouse	NA	NA	21000 cfm	NA	

APPENDIX B
Table 310-1: Source Type and Control Measures

TABLE 310-1

SOURCE TYPE AND CONTROL MEASURES
Vehicle Use In Open Areas And Vacant Lots: 1A Restrict trespass by installing signs. 2A Install physical barriers such as curbs, fences, gates, posts, signs, shrubs, and/or trees to prevent access to the area.
Unpaved Parking Lots: 1B Pave. 2B Apply and maintain gravel, recycled asphalt, or other suitable material, in compliance with subsection 302.1 of this rule. 3B Apply a suitable dust suppressant, in compliance with subsection 302.1 of this rule.
Unpaved Haul/Access Roads: (The control measures listed below (1C-5C) are required work practices, per subsection 308.4 of this rule.) 1C Limit vehicle speed to 15 miles per hour or less and limit vehicular trips to no more than 20 per day. 2C Apply water, so that the surface is visibly moist and subsection 302.2 of this rule is met. 3C Pave. 4C Apply and maintain gravel, recycled asphalt, or other suitable material, in compliance with subsection 302.2 of this rule. 5C Apply a suitable dust suppressant, in compliance with subsection 302.2 of this rule.
Disturbed Surface Areas: **Pre-Activity:** 1D Pre-water site to the depth of cuts. 2D Phase work to reduce the amount of disturbed surface areas at any one time. **During Dust Generating Operations:** 3D Apply water or other suitable dust suppressant, in compliance with Section 301 of this rule. 4D Apply water as necessary to maintain a soil moisture content at a minimum of 12%, as determined by ASTM Method D2216-98 or other equivalent as approved by the Control Officer and the Administrator of EPA. For areas which have an optimum moisture content for compaction of less than 12%, as determined by ASTM Method D1557-91(1998) or other equivalent approved by the Control Officer and the Administrator of EPA, maintain at least 70% of the optimum soil moisture content. 5D Construct fences or 3 foot - 5 foot high wind barriers with 50% or less porosity adjacent to roadways or urban areas that reduce the amount of wind blown material leaving a site. If constructing fences or wind barriers, must also implement 3D or 4D above. **Temporary Stabilization During Weekends, After Work Hours, And On Holidays:** 6D Apply a suitable dust suppressant, in compliance with subsection 302.3 of this rule. 7D Establish vegetative ground cover in sufficient quantity, in compliance with subsection 302.3 of this rule. 8D Restrict vehicular access to the area, in addition to either of the control measures described in 6D and 7D above. **Permanent Stabilization (Required Within 8 Months Of Ceasing Dust Generating**

Operations):

9D Restore area such that the vegetative ground cover and soil characteristics are similar to adjacent or nearby undisturbed native conditions, in compliance with subsection 302.3 of this rule.

10D Pave, apply gravel, or apply a suitable dust suppressant, in compliance with subsection 302.3 of this rule.

11D Establish vegetative ground cover in sufficient quantity, in compliance with subsection 302.3 of this rule.

Open Areas And Vacant Lots:

1E Restore area such that the vegetative ground cover and soil characteristics are similar to adjacent or nearby undisturbed native conditions.

2E Pave, apply gravel, or apply a suitable dust suppressant, in compliance with subsection 302.3 of this rule.

3E Establish vegetative ground cover in sufficient quantity, in compliance with subsection 302.3 of this rule.

Control measures 1F – 1M below are required work practices and/or methods designed to meet the work practices, per Section 308 (Work Practices) of this rule.

Bulk Material Handling Operations And Open Storage Piles:
During Stacking, Loading, And Unloading Operations:

1F Apply water as necessary, to maintain compliance with Section 301 of this rule; and

When Not Conducting Stacking, Loading, And Unloading Operations:

2F Cover open storage piles with tarps, plastic, or other material to prevent wind from removing the coverings; or

3F Apply water to maintain a soil moisture content at a minimum of 12%, as determined by ASTM Method D2216-98, or other equivalent as approved by the Control Officer and the Administrator of EPA. For areas which have an optimum moisture content for compaction of less than 12%, as determined by ASTM Method D1557-91(1998) or other equivalent approved by the Control Officer and the Administrator of EPA, maintain at least 70% of the optimum soil moisture content; or

4F Meet the stabilization requirements described in subsection 302.3 of this rule; or

5F Construct and maintain wind barriers, storage silos, or a three-sided enclosure with walls, whose length is no less than equal to the length of the pile, whose distance from the pile is no more than twice the height of the pile, whose height is equal to the pile height, and whose porosity is no more than 50%. If implementing 5F, must also implement 3F or 4F above.

Bulk Material Hauling/Transporting:
When On-Site Hauling/Transporting Within The Boundaries Of The Work Site When Crossing A Public Roadway Upon Which The Public Is Allowed To Travel While Construction Is Underway:

1G Load all haul trucks such that the freeboard is not less than 3 inches when crossing a public roadway upon which the public is allowed to travel while construction is underway; and

2G Prevent spillage or loss of bulk material from holes or other openings in the cargo compartment's floor, sides, and/or tailgate(s); and

3G Install a suitable trackout control device that controls and prevents trackout and/or removes particulate matter from tires and the exterior surfaces of haul trucks and/or motor vehicles that traverse such work site. Examples of trackout control devices are described in Table 1 (Trackout 1J, 2J, 3J) of this rule; and

When On-Site Hauling/Transporting Within The Boundaries Of The Work Site But Not Crossing A Public Roadway Upon Which The Public Is Allowed To Travel While Construction Is Underway:

4G Limit vehicular speeds to 15 miles per hour or less while traveling on the work site; or

5G Apply water to the top of the load such that the 20% opacity standard, as described in Section 301 of this rule, is not exceeded, or cover haul trucks with a tarp or other suitable closure.

Off-Site Hauling/Transporting Onto Paved Public Roadways:

6G Cover haul trucks with a tarp or other suitable closure; and

7G Load all haul trucks such that the freeboard is not less than 3 inches; and

8G Prevent spillage or loss of bulk material from holes or other openings in the cargo compartment's floor, sides, and/or tailgate(s); and

9G Before the empty haul truck leaves the site, clean the interior of the cargo compartment or cover the cargo compartment.

Cleanup Of Spillage, Carry Out, Erosion, And/Or Trackout:

1H Operate a street sweeper or wet broom with sufficient water, if applicable, at the speed recommended by the manufacturer and at the frequency(ies) described in subsection 308.3 of this rule; or

2H Manually sweep-up deposits.

Trackout:

1J Install a grizzly or wheel wash system at all access points.

2J At all access points, install a gravel pad at least 30 feet wide, 50 feet long, and 6 inches deep.

3J Pave starting from the point of intersection with a paved public roadway and extending for a centerline distance of at least 100 feet and a width of at least 20 feet.

Weed Abatement By Discing Or Blading:

1K Pre-water site and implement 3K or 4K below.

2K Apply water while weed abatement by discing or blading is occurring and implement 3K or 4K below.

3K Pave, apply gravel, apply water, or apply a suitable dust suppressant, in compliance with subsection 302.3 of this rule, after weed abatement by discing or blading occurs; or

4K Establish vegetative ground cover in sufficient quantity, in compliance with subsection 302.3 of this rule, after weed abatement by discing or blading occurs.

Easements, Rights-Of-Way, And Access Roads For Utilities (Electricity, Natural Gas, Oil, Water, And Gas Transmission) Associated With Sources That Have A Non-Title V Permit, A Title V Permit, And/Or A General Permit Under These Rules:

1L	Inside the PM_{10} nonattainment area, restrict vehicular speeds to 15 miles per hour and vehicular trips to no more than 20 per day; or
2L	Outside the PM_{10} nonattainment area, restrict vehicular trips to no more than 20 per day; or
3L	Implement control measures, as described in Table 1 (Unpaved Haul/Access Roads-1C through 5C) of this rule.
Earthmoving Operations On Disturbed Surface Areas 1 Acre Or Larger:	
1M	If water is the chosen control measure, operate water application system (e.g., water truck), while conducting earthmoving operations on disturbed surface areas 1 acre or larger.

[County Rule 310 Table 1]

Technical Support Document (TSD)
Woodcase Fine Cabinetry Inc
3255 West Osborn Road, Phoenix, AZ 85017
Permit Number V97-014
April 20, 2005

I. COMPANY DESCRIPTION

Woodcase Fine Cabinetry, Inc. (Woodcase) manufactures various types of wood cabinets for commercial sale. The facility Standard Industrial Classification (SIC) Code is 2511. The facility receives wood and wood product material by truck. Lumber is taken to the mill were it goes through other woodworking processes depending on the part being produced. The wood product is sanded then finished.

Company Information:

Facility Name:	**Woodcase Fine Cabinetry**, **Inc**. 3255 West Osborn Road Phoenix, AZ 85017
Mailing Address:	Same as facility address

II. Historical Overview

Emission Limits

A. VOC Emission Limits

Based on negotiations with MCESD, Woodcase voluntarily accepted a VOC limit of 10 tons per month and 96 tons per 12 month rolling period to avoid an applicable requirement. On April 19, 2005, Woodcase submitted a Significant Permit Revision to limit their annual VOC limit to forty-five tons per year. This will make Woodcase a synthetic minor source for VOC and added federally enforceable permit conditions to the Title V permit.

(County Rule 240 (NSR))

B. HAP Emission Limits

Woodcase meets the HAP emission limit specified in 40 CFR 63.802 for finishing operations every month by using the averaging approach. Screen3 modeling was performed on the emissions from the source and compared to the Arizona Ambient Air Quality Guidelines (AAAQGs). The modeling showed that the AAAQGs were not exceeded.

C. ODOR LOG

a. DISCUSSION:

County Rule 320 §§300, 302 and 303, entitled "Standards", "Material Containment Required" and "Reasonable Stack Height Required", respectively, apply to this facility and have been incorporated into the permit conditions. Permit conditions based on County Rule 320 §300 are locally enforceable only.

b. MONITORING

The Department's complaint line is used to monitor for compliance with these requirements. In addition, the facility is required to keep a log of odors detected off-site. A copy of the odor log must be provided to the Department in the semiannual monitoring report. If no complaints were received during the semi-annual reporting period, a statement to that effect may be substituted for the copy of the odor log.

D. PM_{10} Limit

There is no facility-wide PM_{10} limit because the facility-wide Potential To Emit (PTE) for PM_{10} considering controls is less than the major source threshold. Facility-wide PM_{10} emissions are calculated to be 21.6 tons per year. This is based on operating 8760 hrs/yr, a 99.5% efficient baghouse, and an 80% efficient cyclone, and assuming PM_{10} = PM_{100}. It is also assumed that 30% of sawdust is $PM_{100,}$ based on the "North Carolina Report" which was provided by the Permittee.

The Permittee provided the following 2001 operating data:
-the cyclone collected 260 yd^3 of woodwaste and operated 1040 hrs/yr
-the baghouse collected 4080 yd^3 of woodwaste and operated 2080 hrs/yr.

$PM_{10cyclone}$ = 260 yd^3 x 275 lbs/yd^3 x 8760hrs per yr/1040 hrs per yr x 0.20 x 0.30 x 1ton /2000 lb= 18.1 tpy

$PM_{10baghouse}$ = 4080 yd^3 x 275 lbs/yd^3 x 8760 hours per yr/2080 hrs per yr x 0.005 x 0.3 x 1ton /2000 lb = 3.5 tpy

$PM_{10total}$ = 18.1 tpy +3.5 tpy = 21.6 tpy

Note: The emissions from the cyclone were back calculated from the wood waste collected, based on the cyclone operating at 80% efficiency. The permit requires the cyclone to operate with a 90% removal efficiency, or show compliance with Maricopa County Rule 311's process weight rate equation through the results of the source test.

III. APPLICABLE REQUIREMENTS

County Rule 311 - Particulate Matter (**Permit Condition 18.2**)

1. Woodworking Emission Limitations

Rule 200, Section 309.2 states: "The Control Officer may require a source of air contaminants, by permit or order, to perform monitoring, sampling, or other quantification of its emissions or air pollution that may reasonably be attributed to such a source. Before requiring such monitoring, sampling, or other quantification by permit or order, the Control Officer shall consider the relative cost and accuracy of any alternatives which may be reasonable under the circumstances such as emission factors, modeling, mass balance analyses, or emissions projections. The Control Officer may require such monitoring, sampling, or other quantification by permit or order if the Control Officer determines in writing that all of the following conditions are met:

a. The actual or potential emissions of air pollution may adversely affect public health or the environment.

b. An adequate scientific basis for the monitoring, sampling, or quantification method exists.

c. The monitoring, sampling, or quantification method is technically feasible for the subject contaminant and the source.

d. The monitoring, sampling, or quantification method is reasonably accurate.

e. The cost of the method is reasonable in light of the use to be made of the data.

Pursuant to Rule 200, Section 309.2, the relative cost and accuracy of emissions projections under the circumstances discussed below is reasonable to determine the relationship of estimated baghouse emissions compared to allowable emissions prescribed in Rule 311.

a) Discussion

The facility is subject to County Rule 311, Particulate Matter from Process Industries, which imposes a cap on hourly emissions of particulate matter based on the process weight of material at the facility. The facility does not process more than 60,000 pounds per day of wood, therefore, an applicable requirement is County Rule 311 §301.1, with the following process weight rate equation:

$E = 3.59P^{0.62}$

Where:
E = Emissions in pounds per hour, and
P = Process weight rate in tons per hour.

Also applicable are County Rule 311 §§305 and 306, which allow Woodcase to comply with the particulate matter standard by operating an approved "Emission Control System (ECS)", with an approved O&M plan. Woodcase operates a 3,700 CFM cyclone, and a 21,000 CFM baghouse. There are no manufacture specifications for the two pieces of emission control equipment. However, the source supplied the emission factor of 90% removal efficiency for a high efficiency centrifugal collector to be used to estimate emissions from the cyclone and the emission factor of 99.5% removal efficiency for the baghouse.

b) Monitoring for Compliance with Woodworking Emission Limitations

Figure 1, below shows a plot of the allowable particulate matter emissions at a facility in pounds per hour (E) versus the weight of wood processed at the facility in tons per hour (P) according to the equation $E = 3.59P^{0.62}$.

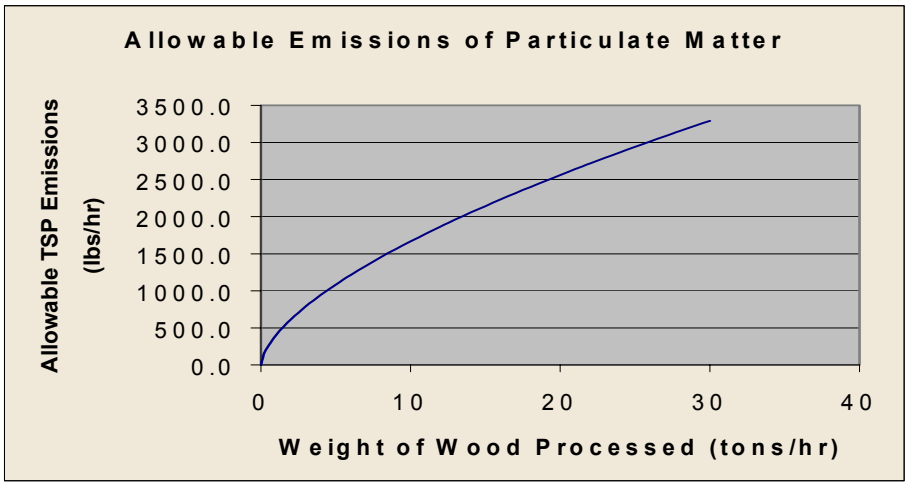

Figure 1: Allowable emissions of particulate matter (PM_{100}) at a facility in pounds per hour based on the process weight of wood at a facility. The allowable emissions for the facility, which processes less than 60,000 lbs/day, are given by the equation in County Rule 311 §301.1.

Emission Limits Calculated by Process Weight Rate Equation

Cyclone

Based on the Title V application submitted by Woodcase, the facility processed 4,209,470 lbs (2105 tons) sheet stock wood products in calendar year 2001. Assuming that the facility has 2080 actual operating hours per year, approximately 1.01 tons of wood are processed per hour. Plugging the process weight in tons per hour yields an emission limit of 3.62 pounds per hour of PM, as follows:

$$E = 3.59 * (1.01)^{0.62}$$

$$= 3.62 \text{lb/hour PM}$$

Actual Emissions of Particulate Matter

A draft report entitled "Estimating Emissions from Generation and Combustion of 'Waste' Wood," (North Carolina Report) by the North Carolina Department of Environment and Natural Resources, gives the following estimate of the percentages of woodwaste generated by various processes at a woodworking facility:

Rough Sawing	20%
Fine Sawing	30%
Sanding	20%
Molding (hog)	40% (sic)

That report also estimates the percentages of woodwaste that is generated by a process that is regulated as PM (<100 micrometer aerodynamic diameter) as follows:

Rough Sawing	18%
Fine Sawing	31%
Sanding	76%
Molding	5.2%

The total percentage of woodwaste generated at a woodworking facility that is regulated as PM can be estimated by multiplying the percentage of the woodwaste generated by a process and the percentage of that woodwaste that is regulated as PM. Using the numbers given in the North Carolina Report yields the following percentage:

$$(0.2 * 0.18) + (0.3 * 0.31) + (0.2 * 0.76) + (0.4 * 0.05) \approx 0.3 \text{ or } 30\%$$

Weight of sawdust generated per year = 71,500 lbs

Weight of sawdust that is PM_{100} = 71,500* 0.3 = 21,450 lbs

Pounds of PM_{100} emitted per year = 21,450*(.1/.9) = 2,145 lbs/year

Pounds of PM_{100} emitted per hour = 2,145 / 2080 = 1.03lbs/ hour

Comparing the actual hourly particulate matter emissions of 1.03lbs/hour to the allowable emissions of 3.62 lbs/ hour demonstrates that the facility is compliance with the process weight rate equation. The source is required to conduct a performance test to verify that the cyclone is operating with a removal efficiency of at least 90% or that the PM emission rate is within the allowable emission limit as defined by the process weight rate equation specified in Rule 311.

In the event that the cyclone does not achieve the required removal efficiency, the permit contains a compliance schedule to remove the cyclone and replace them with a different control technology. At this time the cyclone are operated in accordance with the O&M plan.

Baghouse
Based on the Title V application submitted Woodcase processed 926,553 board feet of hardwood lumber in calendar year 2001. Assuming one (1) board-foot of hardwood weighs 3.4 lbs the total wood weight processed is 3,150,280 lbs (1575 tons) of wood per year. Assuming that the facility has 2080 actual operating hours per year, approximately .76 tons of wood are processed per hour. Plugging the process weight in tons per hour yields an emission limit of 3.03 pounds per hour of PM, as follows:

$$E = 3.59 * (.76)^{0.62}$$

$$= 3.03 \text{lb/hour PM}$$

Weight of sawdust generated per year = 1,122,000 lbs

Weight of sawdust that is PM_{100} = 1,122,000* 0.3 = 336,600 lbs

Pounds of PM_{100} emitted per year = 336,600*(.005/.995) = 1,691 lbs/year

Pounds of PM_{100} emitted per hour = 1,691 / 2080 = .81lbs/ hour

Comparing the actual hourly particulate matter emissions from the baghouse of 0.81lbs/hour to the allowable emissions of 3.03lbs/ hour demonstrates that the facility is in compliance with the process weight rate equation when using the baghouse and if the removal efficiency is 99.5%. The source will need to perform a performance test to verify the removal efficiency of 99.5% or to demonstrate compliance with the process weight rate equation for the baghouse.

The Permittee shall record daily pressure differential readings of the baghouse. The Permit and the most recently approved O&M Plan requires differential pressure for the baghouse to be between 1.0 to 6.0 inches of water. This range was determine from filter bag manufacturer specifications. The Permittee shall log all pressure differential readings, including the date when the reading was taken, identify the baghouse, name or initials of the person who took the reading, and any other related information. The Permittee shall investigate the cause of any reading outside the range of 1.0 to 6.0 inches of water immediately to identify, correct, or repair the problem, and record the in a log the cause of the problem and the corrective action initiated to remedy the abnormal pressure differential reading. Upon replacement of the bags in the baghouse, the differential pressure readings may be between 0.5 and 1.0 inches of water for a period of (7) days. The permittee shall record the dates of bag changes and the differential pressure readings taken during this time.

B. County Rule 300 - Opacity Limits (**Permit Condition 18.3**)

1. Discussion of Opacity Limits
   County Rule 300 restricts visible emissions from any source to 20% opacity, other than emissions of uncombined water. County Rule 300 and the 20% opacity limitation of the permit conditions are locally enforceable only. SIP Rule 30 and the 40% opacity limitation of the permit conditions are federally enforceable.

2. Monitoring for Compliance with Opacity Limits **(Permit Condition 20.B)**
   The Permittee will monitor for compliance with the opacity requirements of this permit by performing a observation of visible emissions on at least twice daily and observe visible emission from the cyclones of each week around the facility, looking for visible emissions from any source capable of visible emissions other than uncombined water. This requirement is intended to regulate the opacity from sources that vent outdoors.
   If visible emissions, other than uncombined water, are observed being discharged into the ambient air, the Permittee shall monitor for compliance with the opacity standards

specified in this permit by having a certified visible emissions evaluator determine the opacity of the visible emissions being discharged into the ambient air using the techniques specified in EPA Reference Method 9.

If the Permittee has observes visible emissions, the initial Method 9 opacity reading shall be taken within twenty four (24) hours of observing visible emissions. . If the emitting equipment is not operating on the day that the initial Method 9 opacity reading is required to be taken, then the initial Method 9 opacity reading shall be taken the next day that the emitting equipment is in operation. If the problem causing the visible emissions is corrected before the initial Method 9 opacity reading is required to be performed, and there are no visible emissions (excluding uncombined water) observed from the previously emitting equipment while the equipment is in normal operation, the Permittee shall not be required to conduct the Method 9 opacity readings.

Follow-up Method 9 opacity readings shall be performed by a certified visible emissions evaluator while the emitting equipment in its standard mode of operation in accordance with the following schedule:

a) Daily:
   (1) Except as provided in the paragraph entitled "Cease Follow-up Method 9 Opacity Monitoring" of this Permit Condition, a Method 9 opacity reading shall be conducted each day that the emitting equipment is operating until a minimum of 14 daily Method 9 readings have occurred.
   (2) If the Method 9 opacity readings required by this Permit Condition are less than 20% for 14 consecutive days, the frequency of Method 9 opacity readings may be decreased to weekly, in accordance with the paragraph entitled "weekly" of this Permit Condition.

b) Weekly:
   (1) If the Permittee has obtained 14 consecutive daily Method 9 readings which do not exceed 20% opacity, the frequency of Method 9 readings may be decreased to once per week for any week in which the equipment is operated.
   (2) If the opacity measured during a weekly Method 9 reading exceeds 20%, the frequency of Method 9 opacity readings shall revert to daily, in accordance with the paragraph entitled "daily" of this Permit Condition.
   (3) If the opacity measured during the required weekly Method 9 readings never exceeds 20%, the Permittee shall continue to obtain weekly opacity readings until the requirements of the paragraph entitled "Cease Follow-up Method 9 Opacity Monitoring" of this Permit Condition are met.

c) Cease Follow-up Method 9 Opacity Monitoring:
   Regardless of the applicable monitoring schedule, follow-up Method 9 opacity readings may cease if the emitting equipment, while in its standard mode of operation, has no visible emissions, other than uncombined water, during every observation taken during a Method 9 procedure.

C. County Rule 320 - Odors and Gaseous Air Contaminants (**Permit Conditions 19.A.1, 2) and 3)**)

Discussion of Operational Limitations on Odors and Gaseous Air Contaminants
County Rule 320 §§300, 302 and 303, entitled "Standards", "Material Containment Required" and "Reasonable Stack Height Required", respectively, apply to this facility and have been incorporated into the permit conditions. Permit conditions based on County Rule 320 §300 are locally enforceable only.

D. County Rule 315 - Spray Coating (**Permit Condition 19.E.**)

The permit conditions associated with County Rule 315 - Spray Coating, discussed below, are locally enforceable only. Woodcase regularly uses spray-coating equipment to apply coating to wood furniture and fixtures. According to the application, the spray coating activity at Woodcase is currently conducted entirely inside the building. Woodcase has automated spray machines with forced air exhaust

1. Spray Coating Outside Buildings inside Enclosures (**Permit Condition 19.E.1) a)**)
   a) Discussion of Limitations on Spray Coating Outside of a Building, Inside an Enclosure
      If the Permittee operates any spray coating equipment outside of a building, the Permittee is required to conduct such activities inside an enclosure with at least three sides a minimum eight feet in height. In addition, it is required that spraying in such enclosures be conducted so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.
   b) Monitoring for Compliance with Limitations on Spray Coating Outside of a Building, Inside an Enclosure (**Permit Condition 20.C.1)**)
      Woodcase will monitor for compliance with these requirements by observing spraying activity inside any enclosure located outside of a building each week to ensure that proper spraying techniques are used. The monitoring is not required any week that the Permittee does not spray in such enclosures.

2. Spray Coating with Forced Air Exhaust
   a) Discussion on Limitations on Spray Coating with Forced Air Exhaust (**Permit Condition 19.E.1)b)**)
      For spray coating equipment with forced air exhaust, County Rule 315 and the Permit require the use of a filtering system with an average overspray removal efficiency of 92% by weight. For regular filters, the Permit also requires that there be no gaps, sags or holes in the filters and that all exhaust is discharged to the atmosphere.
   b) Monitoring for Compliance: Spray Coating with Forced Air Exhaust (**Permit Condition 20.C.2) and 3)**)
      According to manufacturer's information provided in the application, the spray filters at Woodcase have average paint removal efficiencies for various materials ranging from 93% to 98%, to monitor for compliance with the requirements for spray booths with forced air exhaust, Woodcase will continue to maintain information indicating the removal efficiency of the spray filters on site. Because spray coating wood furniture and fixtures is a main activity conducted by this facility, an inspection of the dry filters for gaps, sags or holes is required

on each spray booth, each day the booth operates. Woodcase is required to record the result of the inspections.

E. Reporting Requirements (**Permit Condition 21)**)
Reporting requirements for Woodcase are found in the General Conditions of the permit (Subsections 1-17), Subsection 21 of the permit, and in each of the Subsections 22 - 25.

Subsection 21.A requires the submission of a semi-annual monitoring report, including deviation reporting. That section of the report should be very detailed and should include information such as any day, week or month that any monitoring was required but not performed, a reason for those deviations, and any action taken to ensure that the monitoring will be performed in the future. Additionally, deviations from specified operating ranges or emission limitations or standards should be included, with any additional information.

IV. POTENTIALLY APPLICABLE REQUIREMENTS

A. This permit contains conditions for Solvent Cleaning (County Rule 331), Architectural Coating (County Rule 335) and Dust Generating (County Rule 310). These permit conditions have been included to make the Permittee aware of the applicable requirements should these activities be conducted at the facility. .

Note that the "list" mentioned in the Architectural Coating monitoring section (**Permit Condition 23**) could simply be a compilation of current MSDS sheets.

B. COMPLIANCE ASSURANCE MONITORING (CAM) (40 CFR 64)

The application does not show that CAM does not apply to the source. However, because post-control PTE for PM_{10} is less than the major source level, CAM does not have to be submitted until the permit renewal.

Technical Support Document (TSD)
Woodcase Fine Cabinetry Inc
3255 West Osborn Road, Phoenix, AZ 85017
Permit Number V97-014
Significant Permit Revision S05-007
October 4, 2005

Note: This TSD is in addition and does not replace the existing TSD from the initial Title V permit process.

Woodcase has submitted two permit revisions to this Department. A minor permit revision requesting the addition of a four-belt sander to the equipment list and the removal of two smaller pieces of woodworking equipment. This revision was submitted to the Department April 15, 2005. A significant permit revision (S05-007) was also submitted to voluntarily reduce the allowable annual VOC emissions from 96 tpy to 45 tpy. The significant revision allows Woodcase to become a synthetic minor source for VOC emissions.

Woodcase is located in an area that has been designated as attainment for carbon monoxide (CO), Ozone 1-hour and Sulfur Dioxide. The facility is also located in an Ozone-8 hour area that has been designated as basic non-attainment. PM_{10} is designated as serious non-attainment in this area.

On June 14, 2005 the area was designated from serious to an attainment area for the 1 hour ozone standard. In effect, this would change the areas designation status to the designation of the 8 hour standard. MCAQD's is currently evaluating the ramifications and the legal options to remain designated as a serious non-attainment status for Ozone. At the time of preparation of this TSD, MCAQD has decided to maintain the serious non-attainment classification for Ozone until further legal and technical evaluation can be completed.

Woodcase submitted a significant permit revision on June 9, 2005 to establish a VOC limit of 45 tons per year. A federally enforceable permit condition limiting Woodcase to the 45 tpy VOC emission limit will re-classify the facility as a synthetic minor source of VOCs in a serious non-attainment area for ozone. The major source threshold for a serious non-attainment area is 50 tons per year of VOC or NOx per County Rule 240. The request for this facility-wide VOC limit has been approved by the Department. After the issuance of this permit, Woodcase will be considered a synthetic minor source for VOC emissions. The source will remain a major source of HAPs and will therefore continue to be subject to the Title V permitting requirements.

Woodcase also submitted a minor permit revision on April 19, 2005. The permit revision consisted of removing a Timesaver, model number 525-2, two-head wide belt sander and a Haney Finale duel head orbital sander and replacing these two items with a Costa, model number KA CCCC1350 four head wide belt sander. Woodcase submitted a letter requesting that this Department process the minor permit revision with the significant permit revision. Therefore the previous minor revision will be closed out at the request of Woodcase and the submittal for the minor permit revision shall be treated as an addition to the significant permit revision application. The combining of the permit revisions will expedite the permitting process for Woodcase and utilize the Department resources in the most efficient manner. The addition of the new sander will not create any new particulate emissions. The new piece of equipment is replacing an existing piece of equipment performing the same function. As such, the installing the new machine does not cause a change in emissions.

A major modification applicability analysis was performed during the initial review of the minor permit revision. There was one outstanding issue with the addition of a new and more efficient sander from the information that was submitted to the Department. The addition of a larger and more efficient piece of woodworking equipment could potentially cause an increase in woodworking and furniture manufacturing which could lead to a possible increase in utilization of the spray booths. This would potentially increase the VOC emissions. The past actual emissions from the 2003 and 2004 emission inventory amounted to 21 ton per year of VOC emissions. The previous annual VOC limit was 96 tons per year and 10 tons per month. The difference between the actual VOC emissions and the allowable VOC emissions did not rule out major modification applicability. To expedite the permitting process and to become a synthetic minor source for VOCs, Woodcase submitted a significant permit revision to voluntarily accept a VOC annual emission limit of 45 tons thereby accepting a 24 tpy increase to avoid major modification applicability.